

EXHIBITS

Re: Meet and Confer Meeting Follow up to Data Request No. 1 Public Advocates Office- R1807006
Responses Due: March 22, 2019

INTRODUCTION

On March 6, 2019, the Public Advocates Office sent a meet and confer letter to AT&T Services, Inc. (AT&T) to meet and confer regarding AT&T's responses to Data Request 1. On March 13, 2019 AT&T Assistant Vice President and Senior Legal Counsel David Discher held a telephone conference with Public Advocates Office Counsel Noel Obiora, Program Manager Ana Maria Johnson and Supervisor Camille Watts-Zagha. Pursuant to this discussion, the Public Advocates Office is resending the following data request wording the question as a sentence instead of a matrix format, as agreed during the meet and confer meeting. The questions in this Data Request are a follow up to, and correspond to, the questions in Data Request 1 questions 2-5 sent January 14, 2019.

Public Advocates in the Gas, Electric, Telecommunications and Water Industries

INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules

1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Please restate the text of each Data Request prior to providing the response. For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided in the original electronic format only. All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

DEFINITIONS

- a. “Fixed Broadband Service” or “Fixed Broadband” refers to Internet access services and data plans using xDSL, cable, FTTx, Ethernet, plug and play, satellite, fixed wireless.
- b. “Mobile Broadband Service” or “Mobile Broadband” refers to Internet access services and data plans using Long Term Evolution or other network protocols capable of transmitting data such as 3G, 4G, or 5G.
- c. Voice Service: Consists of Voices services using Voice over Internet Protocol (“VoIP”) Technology, Voice over Long Term Evolution (“VoLTE”) technology, or traditional circuit-switched.
- d. "You", "Your", "Responding Party", "Respondent", and “Company” includes all subsidiaries and affiliates providing service in California.
- e. “Residential” refers to any product or service offering for which no corporate name or registration number is required as a condition of service.
- f. Low-income customer/household refers to any customer that may eligible for a discount based on their income. The income level qualifying for a discount would be specified by your company.

Follow Up to Data Request Nos. 2-3:

FIXED BROADBAND:

1. For the lowest-priced stand-alone fixed broadband product in each of the following speed brackets, listed as items 1.a. to 1.g. below, and offered to residential customers during the month of January 2019,
 - a. less than 10 Mbps
 - b. 10-29 Mbps
 - c. 30-99 Mbps
 - d. 100-199 Mbps
 - e. 200-999 Mbps
 - f. 1-2 Gbps
 - g. 2+ Gbps

Please provide the following:

- I. The lowest monthly recurring price (rack rate), excluding sales tax and CPUC mandated surcharges from the monthly recurring price.

AT&T Response:

AT&T broadband pricing for new customer subscriptions is as follows:

Broadband - IPBB						
	12 mo. Term	12 mo. Term	12 mo. Term	No Term	No Term	
Speed Tier	Bundled***	Standalone		Bundled***	Standalone	
		(Month 1 - 12)	(Month 13 +)			Included Data
Up to 5 Mbps	\$30	\$40	\$50	\$50.00	\$60.00	1TB**
10 to 100 Mbps*	\$40	\$50	\$60	\$60.00	\$70.00	1TB**
300* Mbps	\$60	\$70	\$80	\$80.00	\$90.00	1TB**
500 -1000 Mbps*	\$80	\$90	\$100	\$90.00	\$100.00	Unlimited
* Speeds of 100 Mbps and above require Fiber to the Premises.						
**Overage is \$10 for each 50 GB of usage above the allowance with a maximum charge of \$100 per billing cycle						
*** Bundle = IPBB + at least one qualifying service: VoIP, IPTV, combined billed DTV or combined billed Wireless						

Broadband - DSL				
Speed Tier	Lineshare*		Standalone	Included DATA**
	12 Mo. Term (Month 1 - 12)	12 Mo. Term (Month 13 +)		
Basic (768 Kbps)	\$30	\$38	\$51	150 GB
Express (1.5 Mbps)	\$30	\$46	\$51	150 GB
PRO (3 Mbps)	\$30	\$51	\$56	150 GB
Elite (6 Mbps)	\$30	\$56	\$61	150 GB
*Lineshare means the customer also buys a TDM Access Line.				
**Overage is \$10 for each 50 GB of usage above the allowance with a maximum charge of \$200 per billing cycle				

A. If the price varies by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

AT&T Response:

N/A

II. Service initiation and installation charges.

AT&T Response:

Installation	IPBB	DSL
Internet Activation	\$35	\$49
Full Tech Installation	\$99	\$149

A. If the charge varies by geographic market, provide prices for three sample markets as described 1.h.i.

AT&T Response:

N/A

III. Amount of price reduction that would result from any available contractual or promotional discounts.

AT&T Response:

See chart for term discounts.

- A. If the price reduction varies by geographic market, provide the price reduction for three sample markets as described in 1.h.i.

AT&T Response:

N/A

- IV. Amount of price reduction that would result from any discount available to low-income households that is independent of the state or federal Lifeline discount.

AT&T Response:

AT&T offers “Access from AT&T”, a discounted wireline home internet service to qualifying households. Service availability and speed vary by address; for qualifying households, the highest available speed will be assigned. Pricing is as follows:

768 kilobits per second:	\$5 / month
1.5 megabits per second:	\$5 / month
3 megabits per second:	\$5 / month
5 megabits per second:	\$10 / month
10 megabits per second:	\$10 / month

No installation fee nor term required. Additional information is available at <https://www.att.com/shop/internet/access>

- V. Geographical coverage area in which product is offered

AT&T Response:

The availability of broadband products is determined by service address. The CPUC maintains an “Interactive Broadband Map” at: <http://www.broadbandmap.ca.gov/>

AT&T provides updated information used in the creation of the CPUC’s map pursuant to an annual data request.

- VI. Is a wireline telephone line or TV subscription required for service?

AT&T Response:

No. See chart for bundled pricing.

- VII. Identify the Internet Technology type (limit your answers to the following: xDSL, cable, FTTx, Ethernet, plug and play, satellite, combination, other.)

AT&T Response:

IPBB (Internet Protocol Broadband) and DSL (Digital Subscriber Line).

VIII. Advertised download speed - bitrate (Kbps) Upload speed (Mbps)

AT&T Response:

Download speeds are noted in the charts above in the "Speed Tier" columns. Upload speeds are generally not advertised due multiple factors that impact uploads speeds. See <http://www.att.net/speedtiers> for information regarding upload speeds.

IX. Gigabytes (GB) of data included per month

AT&T Response:

See chart

X. If limited by time, hours/minutes included per month

AT&T Response:

N/A

XI. Type of penalty for exceeding data cap (answers may include the following: continued reduced service, disconnect, automatic surcharge, other, none)

AT&T Response:

See chart. There is no penalty, however \$10 is charged for each additional 50GB of data up to \$100 in extra charges per month for IPBB broadband and up to \$200 in extra charges per month for DSL broadband.

XII. Reduced speed after exceeding limit (Mbps)

AT&T Response:

N/A

XIII. Number of Mailboxes, if any

AT&T Response:

The term "Mailboxes" is not defined, therefore AT&T cannot answer this question without further clarification.

XIV. Is an email address included?

AT&T Response:

Up to 11 email addresses may be active at any given time.

XV. Does the service include a hosted website/page for the customer?

AT&T Response:

No.

XVI. Service plan level of protection (e.g., antivirus, antispam, no protection, other)

AT&T Response:

Residence broadband service includes "Internet Security Suite", which includes virus protection and more. See:

<https://www.att.com/esupport/article.html#!/u-verse-high-speed-internet/KM1010110?gsi=5am5he>

XVII. Contract duration (months)

AT&T Response:

See chart for 12 month term pricing.

XVIII. Termination charge

AT&T Response:

Early Termination is \$180, prorated over the term of the 12 month term.

BROADBAND + FIXED VOICE:

If you do not have a standalone fixed broadband product falling within a specified speed bracket listed as items 1.a. to 1.g. above, offered to residential customers, indicate n/a.

2. For your lowest-priced product that bundles fixed broadband + fixed voice, in each of the following speed brackets, listed as items 2.a. to 2.g. below, and

offered to residential customers during the month of January 2019,

- a. less than 10 Mbps
- b. 10-29 Mbps
- c. 30-99 Mbps
- d. 100-199 Mbps
- e. 200-999 Mbps
- f. 1-2 Gbps
- g. 2+ Gbps

Please provide the following:

[NOTE: Questions I – XVIII are not repeated here]

AT&T Response:

For pricing, see chart provided in response to Question 1 above. For the remaining questions I-XVIII, see answers provided in response to Question 1 above.

FIXED BROADBAND + TV

3. For your lowest-priced product that bundles fixed broadband + TV, in each of the following speed brackets listed as items 3.a. to 3.g. below, and offered to residential customers during the month of January 2019,
- a. less than 10 Mbps
 - b. 10-29 Mbps
 - c. 30-99 Mbps
 - d. 100-199 Mbps
 - e. 200-999 Mbps
 - f. 1-2 Gbps
 - g. 2+ Gbps

Please provide the following:

[NOTE: Questions I – XVIII are not repeated here]

AT&T Response:

For pricing, see chart provided in response to Question 1 above. For the remaining questions I-XVIII, see answers provided in response to Question 1 above.

FIXED BROADBAND + FIXED VOICE + TV

4. For your lowest-priced product that bundles fixed broadband + fixed voice + TV, in each of the following speed brackets, listed as items 4.a. to 4.g. below, and offered to residential customers during the month of January 2019,
- a. Less than 10 Mbps
 - b. 10-29 Mbps
 - c. 30-99 Mbps
 - d. 100-199 Mbps
 - e. 200-299 Mbps
 - f. 1-2 Gbps
 - g. 2+ Gbps

Please provide e following:

[NOTE: Questions I – XVIII are not repeated here]

AT&T Response:

For pricing, see chart provided in response to Question 1 above. For the remaining questions I-XVIII, see answers provided in response to Question 1 above.

FIXED BROADBAND + MOBILE VOICE:

5. For your lowest-priced product that bundles fixed broadband + mobile voice, in each of the following speed brackets, listed as items 5.a. to 5.g. below, and offered to residential customers during the month of January 2019,
- a. less than 10 Mbps
 - b. 10-29 Mbps
 - c. 30-99 Mbps
 - d. 100-199 Mbps
 - e. 200-999 Mbps
 - f. 1-2 Gbps
 - g. 2+ Gbps

[NOTE: Questions I – XVIII are not repeated here]

AT&T Response:

For pricing, see IPBB chart provided in response to Question 1 above. For the remaining questions I-XVIII, see answers provided in response to Question 1 above. See charts below in response to Question 7 for wireless offers.

XIX. Is the mobile voice service offered over 4G: LTE or speed of at least 20Mbps?

AT&T Response:

Yes.

aa. Mobile voice technology type (UMTS, HSPA (+), CSMA 2000, IEEE)

AT&T Response: UMTS / HSPA +

bb. Does the service include hotspot access?

AT&T Response:

See charts with mobile/wireless offers.

cc. VoIP permitted/supported?

AT&T Response:

AT&T does not understand the phrase “VoIP permitted / supported”, and therefore cannot answer this question without clarification.

dd. Data volume included (Mb/month)

AT&T Response:

See chart in provided in response to Question 7 below.

ee. If data volume unlimited, please identify the Fair Use Policy in Mb

AT&T Response:

For Cricket Wireless, see <https://www.cricketwireless.com/terms>

For AT&T Prepaid, see <https://www.att.com/legal/wireless/prepaid-agreements-terms.html>

For AT&T Wireless, see

<https://www.att.com/legal/terms.wirelessCustomerAgreement-list.html>

ff. Does the product include free navigation towards certain sites?

Please identify each site to which the product provides free navigation.

AT&T Response:

AT&T does not understand the phrase “free navigation towards certain sites”, and therefore cannot answer this question without clarification.

gg. Does the product allow a customer to add volume after limit without speed reduction?

AT&T Response:

No.

hh. Is a Smartphone included in the offer?

i. If the answer to sub-item hh is “yes”, please identify the type of smartphone

jj. If the answer to sub-item ii is “yes”, please provide the name of the smartphone (Manufacturer - Model)

AT&T Response:

Smartphones may be selected at the time of service initiation but are not included in the designated price for AT&T Prepaid and AT&T Postpaid plans.

If you do not have a product that bundles fixed broadband + mobile voice falling in each of the speed brackets, listed as items 5.a. to 5.g. above, offered to residential customers, indicate n/a.

ADDITIONAL SERVICE BUNDLES:

6. If you have any additional service bundles not included in questions 1-5, specify the services bundled, and for the lowest-priced service bundle in each of the following speed brackets, listed as items 6.a. to 6.g. below, offered to residential customers during the month of January 2019,
- a. less than 10 Mbps
 - b. 10-29 Mbps
 - c. 30-99 Mbps
 - d. 100-199 Mbps
 - e. 200-999 Mbps
 - f. 1-2 Gbps
 - g. 2+Gbps

Please provide the following:

[NOTE: Questions I – XVIII are not repeated here]

AT&T Response:

AT&T is providing standard, term, and bundled pricing in response to this data request. AT&T may offer limited term promotions from time to time which may vary by geography and which may provide other benefits to customers such as gift cards or other incentives.

Follow Up to Data Requests No. 4-5:

7. Please review each of the following products listed below, items 7.a. to 7pp., and identify each product Your Company offered to residential customers in January 2019:

Prepaid Plans

AT&T Prepaid

AT&T Prepaid Mobile Voice Monthly Price	\$30	\$35	\$50	\$65	\$85	\$2/day (no monthly)	25 cents/min. (no monthly)
Included in Monthly Price:							
Talk	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	\$0.25/min
Text	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	-
Data - high speed	-	1GB	8GB	Unlimited	Unlimited	-	-
Mobile hotspot	-	included	included	-	10GB	-	-
Unlimited talk & text to Mexico & Canada	-	-	included	included	included	-	-
Use talk, text & data in Mexico & Canada	-	-	included	included	included	-	-
Discount with Autopay:	\$25	\$30	\$40	\$55	\$75	NA	NA
Multi-Line Discounts:	Line 2 - \$10 off; Line 3 - \$10 off; Line 4 - \$20 off; Line 5 - \$20 Off						

Prepaid DATA Only		
Price	Included DATA	Additional Data
\$75	15 GB	2 GB - \$10
\$50	8 GB	1.5 GB - \$10
\$25	3 GB	1 GB - \$10

AT&T DATACONNECT Plans

(Postpaid Data - Only Plans)

	Tablets, LTE Cameras & Gaming Devices			Laptops, Mobile Hotspots & USB Modems		Location Services*
Included Data	250MB	3GB	5GB	10GB	15GB	Included
Monthly Price	\$14.99	\$30.00	\$50.00	\$50.00	\$70.00	\$10.00
Data Overage	\$14.99 per 250MB	\$10 per 1 GB	\$10 per 1 GB	\$10 per 1 GB	\$10 per 1 GB	NA

*Location Services: Devices include automotive devices without built-in in-vehicle wireless connectivity and eligible smart locators. Certain smart locators may have limited voice and text capabilities such as the ability to dial preprogrammed number/s and receive text messages from a pre-programmed number. These devices cannot dial/receive 911 calls.

Cricket Wireless Prepaid	Monthly per line			
Unlimited talk and text*	\$25			
Cricket Multiline Pricing	Monthly Prices			
	1-Line	2-Lines	3-Lines	4-Lines
Unlimited talk and text; plus 2GB of data: 2GB high-speed data access with speeds up to 4G LTE*	\$30	\$60	\$90	\$120
Unlimited talk and text; plus 5GB of data: 5 GB high-speed data access with speeds up to 4G LTE* **\$35 with Autopay \$5 discount	\$40 **	\$70	\$90	\$110
Unlimited talk, text and unlimited high-speed data access with speeds up to 3Mbps* **\$45 with Autopay \$5 discount	\$50 **	\$80	\$90	\$100
Unlimited talk, text and unlimited high-speed data access with speeds up to 4G LTE * **\$55 with Autopay \$5 discount	\$60 **	\$90	\$120	\$150

*For details, terms and conditions, see <https://www.cricketwireless.com>

Postpaid Unlimited Plans				
	1-Line	2-Lines	3-Lines	4-Lines**
AT&T Unlimited & MoreSM				
Includes: *	\$70	\$125	\$145	\$160
Unlimited talk, text, data, SD Streaming (max of 1.5 Mbps), TV, Unlimited calls to/roaming in Mexico/Canada, Suspected spam and fraud alerts				
AT&T Unlimited & MoreSM Premium				
Includes: *	\$80	\$150	\$170	\$190
Unlimited talk, text, data, HD Streaming, TV, Unlimited calls to/roaming in Mexico/Canada, 15GB Mobile Hotspot, Suspected spam and fraud alerts + one premium entertainment option				
* For details, terms and conditions, see https://www.att.com/plans/wireless.html				
** Add \$35 for each additional line, see https://www.att.com/plans/wireless.html				

Postpaid Shared Data Plans				
Includes: *				
Unlimited talk, text, Rollover Data SM , Mobile Hotspot, Unlimited calls to/roaming in Mexico, Suspected spam and fraud alerts Plus:	1-Line	2-Lines	3-Lines	4-Lines**
Mobile Share Plus SM 3GB, includes 3GB of data	\$50	\$80	\$100	\$120
Mobile Share Plus SM 9GB, includes 9GB of data	\$60	\$100	\$120	\$140
* For details, terms and conditions, Rollover Data SM , See https://www.att.com/plans/wireless.html				
** Add \$20 for each additional lines, see https://www.att.com/plans/wireless.html				

- a. Prepaid Mobile Voice + Text (no data), specify the fewest minutes and texts available in a product: See charts, above
- b. Postpaid Mobile Voice + Text (no data),(assume 1-2 lines), specify the fewest minutes and texts available in a product *
- c. Postpaid Mobile Voice + Text (no data),(assume 3+ lines), specify the fewest minutes and texts available in a product *

- d. Prepaid Mobile Voice + Text (no data), unlimited volume: See charts above
- e. Postpaid Mobile Voice + Text (no data),(assume 1-2 lines), unlimited volume *
- f. Postpaid Mobile Voice + Text (no data),(assume 3+ lines), unlimited volume *
- g. Prepaid Mobile Data Only, unlimited volume *
- h. Prepaid Mobile Data Only, 100 MB *
- i. Prepaid Mobile Data Only, 200 MB *
- j. Prepaid Mobile Data Only, 1 GB *
- k. Prepaid Mobile Data Only, 2 GB *
- l. Prepaid Mobile Data Only, 5 GB *
- m. Prepaid Mobile Data Only, 10 GB *
- n. Prepaid Mobile Data Only, 20 GB *
- o. Prepaid Mobile Data Only, 50 GB *
- p. Postpaid Mobile Data Only, unlimited volume: *
- q. Postpaid Mobile Data Only, 100 MB *
- r. Postpaid Mobile Data Only, 200 MB *
- s. Postpaid Mobile Data Only, 1 GB *
- t. Postpaid Mobile Data Only, 2 GB *
- u. Postpaid Mobile Data Only, 5 GB: See Postpaid- Data Only chart above
- v. Postpaid Mobile Data Only, 10 GB: See Postpaid- Data Only chart above
- w. Postpaid Mobile Data Only, 20 GB *
- x. Postpaid Mobile Data Only, 50 GB *
- y. Prepaid Mobile Voice + Text + Data (100 MB), unlimited voice + text *
- z. Prepaid Mobile Voice + Text + Data (200 MB), unlimited voice + text *
- aa. Prepaid Mobile Voice + Text + Data (1 GB), unlimited voice + text: See chart
- bb. Prepaid Mobile Voice + Text + Data (2 GB), unlimited voice + text *
- cc. Prepaid Mobile Voice + Text + Data (5 GB), unlimited voice + text *
- dd. Prepaid Mobile Voice + Text + Data (10+ GB), unlimited voice + text *
- ee. Postpaid Mobile Voice + Text + Data (100 MB), unlimited voice + text (assume 1-2 lines) *
- ff. Postpaid Mobile Voice + Text + Data (200 MB), unlimited voice + text (assume 1-2 lines) *
- gg. Postpaid Mobile Voice + Text + Data (1 GB), unlimited voice + text (assume 1-2 lines) *
- hh. Postpaid Mobile Voice + Text + Data (2 GB), unlimited voice + text (assume 1-2 lines) *
- ii. Postpaid Mobile Voice + Text + Data (5 GB), unlimited voice + text (assume 1-2 lines) *
- jj. Postpaid Mobile Voice + Text + Data (10+ GB), unlimited voice + text (assume 1-2 lines) *
- kk. Postpaid Mobile Voice + Text + Data (100 MB), unlimited voice + text (assume 3+ lines) *
- ll. Postpaid Mobile Voice + Text + Data (200 MB), unlimited voice + text (assume 3+ lines) *
- mm. Postpaid Mobile Voice + Text + Data (1 GB), unlimited voice + text (assume 3+ lines) *

- nn. Postpaid Mobile Voice + Text + Data (2 GB), unlimited voice + text (assume 3+ lines) *
- oo. Postpaid Mobile Voice + Text + Data (5 GB), unlimited voice + text (assume 3+ lines) *
- pp. Postpaid Mobile Voice + Text + Data (10+ GB), unlimited voice + text (assume 3+ lines) *

AT&T Response:

* For most of the options in aa.- pp., above, AT&T does not offer the plan details described, however, in the charts above for prepaid and postpaid offers, AT&T has listed the available plan it offers.

For each of the above products for which Your Company offered a product to residential customers during the month of January 2019, please provide the following:

- I. The lowest recurring monthly price for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price. Exclude service initiation and installation charges, and assume no promotions or discounts.

AT&T Response:

See charts, above. The rates for some offers include a discount for subscribing to autopay and/or paperless billing. Where such a discount applies, the information is included in the charts above.

- II. If prices for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

AT&T Response:

N/A

- III. The lowest charges for service initiation or installation for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price and assume no promotions or discounts.

AT&T Response:

For Cricket Wireless: \$25 activation fee per line

For AT&T Prepaid: N/A (\$0)

For AT&T Postpaid: \$30 activation fee per line

- IV. If service initiation or installation charges for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

AT&T Response:

N/A

- V. The price reduction that would be applied for any available contractual promotions or discounts.

AT&T Response:

Autopay and Paperless bill discounts are applicable to select service offers as shown within the charts above.

- VI. If price reductions for contractual promotions or discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census designated place and/or zip code.

AT&T Response:

N/A

- VII. The price reduction that would be applied for a discount available to low-income customers that is independent of the federal or state Lifeline discount.

AT&T Response:

N/A

- VIII. If price reductions for low-income discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

AT&T Response:

N/A

IX. Contract duration

X. Is the service offered over 4G: LTE or speed of at least 20Mbps?

AT&T Response:

Yes

XI. Technology type (UMTS, HSPA (+), CSMA 2000, IEEE)

AT&T Response:

UMTS / HSPA +

XII. Does the service include hotspot access?

AT&T Response:

Yes, if reflected in the charts above.

XIII. VoIP permitted/supported?

AT&T Response:

AT&T does not understand the phrase “VoIP permitted / supported”, therefore AT&T cannot answer this question without further clarification.

XIV. Data volume included (Mb/month)

AT&T Response:

See charts for AT&T Prepaid, Cricket Wireless and Postpaid services.

XV. If data volume unlimited, please identify the Fair Use Policy in Mb

AT&T Response:

For Cricket Wireless, see <https://www.cricketwireless.com/terms>

For AT&T Prepaid, see <https://www.att.com/legal/wireless/prepaid-agreements-terms.html>

For AT&T Wireless, see <https://www.att.com/legal/terms.wirelessCustomerAgreement-list.html>

XVI. Does the product include free navigation towards certain sites? If yes, which ones?

AT&T Response:

AT&T does not understand the phrase “free navigation towards certain sites”, therefore AT&T cannot answer this question without further clarification.

XVII. Does the product allow a customer to add volume after limit without speed reduction?

AT&T Response:

No. There are no charges for overages, however, after high-speed data allowances are used, speeds are slowed/reduced.

See website <https://www.cricketwireless.com/> for Cricket Wireless;
See website <https://www.att.com/prepaid> for AT&T Prepaid;
See website <https://www.att.com/plans/wireless.html> for AT&T postpaid.

XVIII. Is a Smartphone included in the offer?

AT&T Response:

Smartphones may be selected at the time of service initiation but are not included in the designated price for AT&T Prepaid and AT&T Postpaid plans.

XIX. If the answer to sub-item XVIII is “yes”, please identify the type of smartphone

AT&T Response:

N/A

XX. If the answer to sub-item XIX is “yes”, please provide the name of the smartphone (Manufacturer - Model)

AT&T Response:

See XVIII, above.

From: DISCHER, DAVID (Legal) <dd2526@att.com>
Sent: Wednesday, May 1, 2019 12:16:15 PM
To: Obiora, Noel
Subject: R. 18-07-006 - AT&T's Follow-Up Response to DR1

Noel, below are the answers to your further questions as further clarified on our call last week.

David Discher
Assistant Vice President – Senior Legal Counsel AT&T Services Inc.
(415) 268-5351

>

> -----Original Message-----

> From: Obiora, Noel <noel.obiora@cpuc.ca.gov>

> Sent: Monday, April 22, 2019 9:43 AM

> To: DISCHER, DAVID (Legal) <dd2526@att.com>

> Subject: R. 18-07-006 - AT&T's Follow-Up Response to DR1

>

> Dear Mr. Discher,

>

> The Public Advocates Office is in receipt of AT&T's response to the Public Advocates Office Follow Up Clarifications To Data Request (DR1) issued January 14, 2019. Unfortunately, AT&T's response still fails to answer many of the questions in DR.

>

> AT&T and the Public Advocates Office met and conferred about DR1 on March 13, 2019. You stated that notwithstanding AT&T's objections, AT&T provided partial responses to the questions in DR1. Whereupon, the Public Advocates Office explained that AT&T's partial responses, which consisted of weblinks to where certain information might be found, was unworkable as it would not allow us to identify all relevant combinations of service bundles and speeds. We provided an example by asking how the weblink might lead us to AT&T's lowest price at its lowest speed, offered for standalone broadband service. You then responded that if the questions were asked in a manner similar to the example provided at meet and confer, AT&T would have been able to answer the questions. You clarified AT&T's unwillingness to provide responses was related to the chart or table format but not necessarily to the information sought. Whereupon, the Public Advocates Office agreed to send a follow-up Data Request that clarified and detailed some of the questions.

>

> AT&T's most recent response of April 18, 2019 to the follow-up questions are deficient in the following respects:

>

> With regard to Question 1 I., about AT&T's standalone broadband prices. Question 1 asks for the lowest broadband prices regardless of customer status, new or existing. AT&T's responses indicate the prices are for new customers, and provides no information regarding existing customers.

The standalone broadband rates provided on April 18, 2019, went into effect June 10, 2018.

>

> AT&T provides prices for terms "Activation" and "Full Service Installation" but does not indicate if both Activation and "Full Service Installation" combined are required, or if only one might be required. Nor does AT&T explain if these prices are applicable for each product listed in the charts provided in response to Q1.

The installation costs apply to the Broadband DSL and Broadband IPBB. The customer chooses one or the other.

> With regard to Question 11IA., AT&T states N/A. Please confirm that AT&T pricing is uniform throughout California.

Yes, pricing is uniform.

>

> Questions 2-6 of the Data Request seeks price information for a customer that subscribes to multiple services (bundles). AT&T's responses, in the chart under Question 1, indicates a the same price for a bundle of any one service combined with IPBB Broadband (VoIP, IPTV, combined billed DTV or combined billed Wireless). Please confirm that regardless of service bundled with IPBB Broadband, there is no price difference. AT&T also fails to provide pricing for more than one service bundled with IPBB. unless AT&T's use of the term "at least one," implying that a customer will pay the same price without regard to the number services purchased, is correct. Please confirm that a customer purchasing IPBB broadband AND VoIP AND IPTV and Wireless will pay the price listed in one of the columns labeled "Bundled."

Yes, the BB pricing within the bundle will be the same, however, the TV component adds another cost. See below.

Broadband Service (BB)	Speed Tier		Lowest BB Price	Lowest Price TV*	Lowest Price Bundle BB +TV (12 month Price)*	Lowest Price Bundle BB +TV (months 13-24)	No 24-Month Commitment
Broadband - IPBB	Up to 5 Mbps	12- Month Term Bundle	\$30.00	\$40.00	\$70.00	\$111.00	NA
		No Term Bundle	\$50.00	\$81.00	NA	NA	\$131.00
	10 to 100 Mbps	12- Month Term Bundle	\$40.00	\$40.00	\$80.00	\$121.00	NA
		No Term Bundle	\$60.00	\$81.00	NA	NA	\$141.00
	300 Mbps	12- Month Term Bundle	\$60.00	\$40.00	\$100.00	\$141.00	NA
		No Term Bundle	\$80.00	\$81.00	NA	NA	\$161.00
	500 -1000 Mbps	12- Month Term Bundle	\$80.00	\$40.00	\$120.00	\$161.00	NA
		No Term Bundle	\$90.00	\$81.00	NA	NA	\$171.00
	Speed Tier		BB Price	Lowest Price TV*	Lowest Price Bundle BB +TV (12 month Price)*	Lowest Price Bundle BB +TV (months 13+)	No 24-Month Commitment
Broadband - DSL**	Basic (768 Kbps)	Lineshare 12-Month Term Bundle	\$30.00	\$40.00	\$70.00	NA	NA
		Lineshare Months 13+	\$38.00	\$40.00	NA	\$78.00	NA
		No Term pays standalone price	\$51.00	\$81.00	NA	NA	\$132.00
	Express (1.5 Mbps)	Lineshare 12-Month Term Bundle	\$30.00	\$40.00	\$70.00	NA	NA
		Lineshare Months 13+	\$46.00	\$40.00	NA	\$86.00	NA
		No Term pays standalone price	\$51.00	\$81.00	NA	NA	\$132.00
	PRO (3 Mbps)	Lineshare 12-Month Term Bundle	\$30.00	\$40.00	\$70.00	NA	NA
		Lineshare Months 13+	\$51.00	\$40.00	NA	\$91.00	NA

	No Term pays standalone price	\$56.00	\$81.00	NA	NA	\$137.00
Elite (6 Mbps)	Lineshare 12-Month Term Bundle	\$30.00	\$40.00	\$70.00	NA	NA
	Lineshare Months 13+	\$56.00	\$40.00	NA	\$96.00	NA
	No Term pays standalone price	\$61.00	\$81.00	NA	NA	\$142.00

* Lowest TV rate requires 24 month commitment: Rate is locked in for months 1-12; Subtract \$5.00 for auto bill pay discount

*Lineshare means the customer also buys a TDM Access Line.

> Because the prices in the chart show a lower price for bundled IPBB Broadband than standalone IPBB broadband, the implication is the bundled price displayed in the chart is for only the portion of the IPBB broadband service in the bundle and not the total price of the bundle. Please confirm that the prices AT&T displays in the columns in Chart 1 labeled bundle, are only for a portion of the bundle and not the complete price.

>

Yes. Refer to the chart above.

> As requested in Questions 2-6, please provide the complete lowest price for each service bundle in each speed range.

>

> Furthermore, AT&T lists for the Broadband-DSL chart, only one service (TDM Access line) that is bundled with Broadband-DSL. Please confirm that AT&T does not offer Broadband-DSL bundled with any of the following: VoIP, IPTV, combined billed DTV or combined billed Wireless. If AT&T offers bundles with Broadband-DSL and any of the following: VoIP, IPTV, combined billed DTV or combined billed Wireless, please provide the prices of each bundle.

Yes, AT&T does not offer Broadband-DSL bundled with any other service. Without a TDM Access Line, DSL is available only available as a standalone service. Other service components can be order, but no bundled pricing discounts apply. The chart above shows standalone DSL plus the lowest price TV package available, at rack rates.

>

> AT&T does not provide, as requested in Question 3, the features, terms, and conditions of any of the services when bundled with broadband: VoIP, IPTV, combined billed DTV or combined billed Wireless.

All terms and conditions for VoIP, IPTV, DTV (same regardless if combined bill or not) and Wireless (same regardless if combined billed or not) may be found on the following location: www.att.com/legal . The services are listed on the left side of the screen. The term "feature" is not defined, however, details associated with a particular service would be included in the terms and conditions.

>

> I would appreciate any clarifications you can provide us on these remaining issues, so we don't have to further litigate this Data Request.

>

> Sincerely,

>

> Noel Obiora

> Counsel for Public Advocates Office

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

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

R.18-07-006
(Filed July 12, 2018)

**AT&T'S RESPONSES TO
PUBLIC ADVOCATES OFFICE
DATA REQUEST NO. 1**

January 30, 2019

AT&T California, AT&T Corp., SBC Long Distance, Cricket Wireless LLC, Santa Barbara Cellular Systems LTD, AT&T Mobility Wireless Operations Holdings, Inc., and New Cingular Wireless PCS, LLC (collectively, "AT&T") hereby provide their initial responses to the Public Advocates Office ("PAO") Data Request No. 1 – sent to AT&T on January 14, 2019. AT&T expressly reserves the right to add to, supplement, or modify these responses as circumstances and further investigation and developments may warrant. Nothing contained in AT&T's initial responses to any request is intended to be, or in any way constitutes, a waiver of its objections or right to object to any additional, supplemental, or further response to that request, or any part thereof. Any confidential or proprietary information or documents that AT&T produces to PAO are subject to the provisions of Public Utilities Code section 583, General Order 66-C.

GENERAL OBJECTIONS

AT&T makes the following General Objections to the Public Advocates Office ("PAO") first set of data requests. AT&T incorporates these General Objections by reference into AT&T's objections to each and every request below as if fully repeated therein:

1. AT&T objects to PAO's instructions for responding to the data requests. PAO is not entitled to issue such instructions, nor is AT&T required to follow them. Cal. C.C.P §2030.060 ("No preface or instruction shall be included with a set of interrogatories."). Nor is there any agreement in this docket or between the parties to follow any set of instructions. AT&T therefore objects to each and every instruction submitted with the data requests. AT&T further objects to PAO's instructions to the extent they seek to make requests continuing in nature. *See, e.g.*, Cal. C.C.P. §2030.060(g) ("An interrogatory may not be made a continuing

one so as to impose on the party responding to it a duty to supplement an answer.”).

Accordingly, AT&T objects to and is not bound by PAO's instructions.

2. AT&T objects to the extent any request, definition, or instruction seeks documents or information about services or business activities that are not subject to the jurisdiction of the Commission, because such request is irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it seeks to impose requirements or obligations on AT&T beyond, in addition to, or different from those imposed by California law or Commission rules and practices.

4. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

5. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it seeks documents or information protected from discovery by the attorney-client privilege, the work-product doctrine, the community of interest doctrine, or any other applicable privilege, immunity, or doctrine. Pursuant to this objection, AT&T specifically reserves the right to request the return of such documents or information from PAO, without prejudice to any claim of privilege, in the event any such document or information is inadvertently produced. Nothing contained in these responses is intended to be, or in any way constitutes, a waiver of any such applicable privilege, immunity, or doctrine.

6. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it seeks information about any and all of respondents' affiliates,

subsidiaries, parent companies, boards of directors, shareholders, current or former officers, directors, employees, agents, representatives, contractors, subcontractors, or consultants, and any persons or other entities who have acted or purported to act on its behalf, as over-broad and oppressive.

7. AT&T objects as unreasonable and burdensome to the instruction that “if You are unable to provide a response by this date, notify PAO as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided.”

8. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it is overly broad, unduly burdensome, oppressive or, as written, would be unduly expensive or time consuming to provide a response.

9. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it is overly broad, vague, imprecise, ambiguous, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests, and to the extent it seeks documents or information not identified with reasonable particularity. AT&T reserves the right to define its own terms in its responses.

10. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it seeks documents or information that are beyond AT&T's knowledge, possession, custody or control.

11. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it seeks documents or information that is not collected or maintained by AT&T in the normal course of business including, but not limited to, documents or information that would require AT&T to undertake special studies.

12. AT&T objects to each and every request, as well as to each definition and instruction, to the extent it is not limited to any stated period of time, or relates to a stated period of time that is longer than is relevant for purposes of the issues in this docket and the applicable statute of limitations, as such discovery is overly broad and unduly burdensome.

13. AT&T objects to each request to the extent it purports to apply to any person, entity, or service that is not subject to the jurisdiction of the Commission.

14. AT&T objects to each request to the extent it seeks information regarding AT&T's or its affiliates' operations in states other than California. In this regard, AT&T specifically objects to the instructions that state that: "If the responsive documents or data are not limited to California data, and producing a California-only document would be burdensome, please so indicate and provide the multi-state or nationwide data." Such information is not within the scope of the OIR or the Commission's jurisdiction and as such is not an appropriate subject of discovery.

15. AT&T objects to each request to the extent the request seeks data or information regarding interstate services.

16. AT&T objects to each request to the extent that it seeks the production of information and/or documents that are not readily available to AT&T, or not in AT&T's possession, custody, or control.

17. AT&T objects to each data request to the extent that it exceeds the requirements of applicable law or purports to impose upon AT&T any obligations broader than those set forth in the California Code of Civil Procedure, the California Public Utilities Code, the Commission Rules of Practice and Procedure, or other applicable law.

18. AT&T objects to each request to the extent that it seeks the production of information and/or documents that is readily accessible to the requesting party(ies) from other sources.

Data Request No. 1:

Please list all companies affiliated with **AT&T Corp.** offering products and/or services to residential customers.

Response to Data Request No. 1:

In addition to the General Objections, which are incorporated by reference, AT&T objects to this request to the extent it requests information that is not relevant or will not likely lead to the discovery of relevant information as it requests information beyond affiliates that provide communications services in California. Subject to and without waiving its objections, AT&T states as follows. The affiliated entities of AT&T Corp. that offer communications services to residential customers in California are:

AT&T California (Pacific Bell Telephone Company)

AT&T Corp.

SBC Long Distance

Cricket Wireless LLC

New Cingular Wireless PCS, LLC, Santa Barbara Cellular Systems, Ltd., and AT&T Mobility Wireless Operations Holdings, Inc., collectively doing business as "AT&T Mobility"

Data Request No. 2:

For each combination of service bundle and download speed for which your company¹ offers at least one product to residential customers during the month of January 2019, please provide the following:

- a. The lowest monthly recurring price (rack rate) for each combination of service bundle and Internet download speed. Exclude sales tax and CPUC mandated surcharges from the monthly recurring price. Separately, provide service initiation and installation charges. Separately, provide the amount of price reduction that would result from any available contractual or promotional discounts. Separately, provide amount of price reduction that would result from any discount available to low-income households that is independent of the state or federal Lifeline discount.
- b. If prices for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

If you do not have a residential product at a particular combination of service bundle and speed, please indicate 0. The table below illustrates the combinations of service bundles and speeds.

Broadband download speed	Fixed broadband (standalone)	Fixed broadband + fixed voice	Fixed broadband + TV	Fixed broadband + fixed voice + TV	Fixed broadband + mobile voice	Specify any additional service bundles not identified that you offer. Add additional columns as necessary:
Lowest download speed offered: specify download speed offered						

¹ "You" includes your company, any affiliates, and subsidiaries.

10-29 Mbps							
30-99 Mbps							
100-199 Mbps							
200-999 Mbps							
1-2 Gbps							
2+ Gbps							

Response to Data Request No. 2:

In addition to its General Objections, which are incorporated by reference, AT&T objects to the request to fill out PAO’s chart, the information necessary to do so is equally available to PAO; consequently, AT&T has no obligation to undertake such work for PAO. In addition, AT&T objects to the reference to “broadband,” “mobile,” “TV,” or “VoIP,” services since the Commission lacks jurisdiction to regulate the rates or provision of said services, or to attempt to regulate said services by allowing intrusive discovery regarding such services. AT&T objects to this data request as seeking information outside the scope of this proceeding, as defined by the Scoping Memo (at 3), which is limited to “affordability issues across Commission jurisdictional utility services, including water, energy, and telecommunications services.” Neither broadband nor TV are “utility” services or “telecommunications” services within the Commission’s jurisdiction. AT&T also objects to the level of detail requested as being overbroad and unduly burdensome. Subject to and without waiving its objections, AT&T states as follows. Please see below:

See AT&T Internet Service Plans at <https://www.att.com/internet/internet-services.html>

See AT&T U-verse TV + internet bundle at <https://www.att.com/bundles/u-verse.html>

See AT&T U-verse TV + internet + home phone bundle at <https://www.att.com/home-phone/plans.html>

See AT&T DIRECTV + internet bundles at <https://www.att.com/bundles/directv-internet.html>

See AT&T DIRECTV + wireless bundles at <https://www.att.com/bundles/directv-wireless.html>

See AT&T Access program at <https://www.att.com/shop/internet/access/index.html#!/>

See AT&T Mobility Fixed wireless broadband at <https://www.att.com/internet/fixed-wireless.html>

Data Request No. 3:

On Tab 2 of the attached spreadsheet, for each product priced on Tab 1, provide additional features/details of the offer.

Response to Data Request No. 3:

Please see Response to Data Request No. 2.

Data Request No. 4:

Mobile Broadband: Prices of Residential Products Offered

For each combination of service bundle and volume (data, minute, text allowances) for which your company² offers at least one product to residential customers during the month of January 2019, please provide the following:

- (on Tab 3 of attached spreadsheet)
- a. The lowest recurring monthly price for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price. Exclude service initiation and installation charges, and assume no promotions or discounts.
 - b. If prices for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.
- (on Tab 4 of attached spreadsheet)
- c. The lowest charges for service initiation or installation for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price and assume no promotions or discounts.
 - d. If service initiation or installation charges for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.
- (on Tab 5 of attached spreadsheet)
- e. The price reduction that would be applied for any available contractual promotions or discounts.
 - f. If price reductions for contractual promotions or discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census designated place and/or zip code.
- (on Tab 6 of attached spreadsheet)
- g. The price reduction that would be applied for a discount available to low-income customers that is independent of the federal or state Lifeline discount.

² "You" includes your company, any affiliates, and subsidiaries.

- h. If price reductions for low-income discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

If you do not have a residential product at a particular combination of service bundle and speed, please indicate 0. Provide all responses on the specified tabs of the attached spreadsheet. The table below illustrates the combinations of service bundles and volumes. N/a in the table below indicates combinations that are not possible because either voice/text or data is not included.

Volumes: Minutes, Texts, Data Allowances	VOICE & TEXT ONLY			DATA ONLY		VOICE,TEXT,DATA		
	Prepaid Mobile Voice + Text (no data)	Postpaid Mobile Voice + Text (no data) (assume 1-2 lines)	Postpaid Mobile Voice + Text (no data) (assume 3+ lines)	Prepaid Mobile Data	Postpaid Mobile Data	Prepaid Mobile Data + Voice + Text	Postpaid Mobile Data + Voice + Text (assume 1-2 lines)	Postpaid Mobile Data + Voice + Text (assume 3+ lines)
lowest quantity offered, specify:								
Unlimited Voice+ Text				n/a	n/a	n/a	n/a	n/a
100 MB	n/a	n/a	n/a			n/a	n/a	n/a
200 MB	n/a	n/a	n/a			n/a	n/a	n/a
1 GB	n/a	n/a	n/a			n/a	n/a	n/a
2 GB	n/a	n/a	n/a			n/a	n/a	n/a
5 GB	n/a	n/a	n/a			n/a	n/a	n/a
10 GB	n/a	n/a	n/a			n/a	n/a	n/a
20 GB	n/a	n/a	n/a			n/a	n/a	n/a
50 GB	n/a	n/a	n/a			n/a	n/a	n/a
100 MB + Unlimited Voice+Text	n/a	n/a	n/a	n/a	n/a			
200 MB + Unlimited Voice+Text	n/a	n/a	n/a	n/a	n/a			

1 GB + Unlimited Voice+Text	n/a	n/a	n/a	n/a	n/a			
2 GB+ Unlimited Voice+Text	n/a	n/a	n/a	n/a	n/a			
5 GB+ Unlimited Voice+Text	n/a	n/a	n/a	n/a	n/a			
10 GB+ Unlimited Voice+Text	n/a	n/a	n/a	n/a	n/a			
If necessary, specify other common volumes								

Response to Data Request No. 4:

In addition to its General Objections, which are incorporated by reference, AT&T objects to the request to fill out PAO’s chart, the information necessary to do so is equally available to PAO; consequently, AT&T has no obligation to undertake such work for PAO. In addition, AT&T objects to the reference to “broadband,” “mobile,” “text,” or “VoIP,” services since the Commission lacks jurisdiction to regulate the rates or provision of said services, or to attempt to regulate said services by allowing intrusive discovery regarding such services.

AT&T objects to this data request as seeking information outside the scope of this proceeding, as defined by the Scoping Memo (at 3), which is limited to “affordability issues across Commission jurisdictional utility services, including water, energy, and telecommunications services.”

Neither broadband nor text are “utility” services or “telecommunications” services within the Commission’s jurisdiction. AT&T also objects to the level of detail requested as being overbroad and unduly burdensome. Subject to and without waiving its objections, AT&T states as follows.

Please see below:

See AT&T Mobility postpaid offers at <https://www.att.com/plans/wireless.html>

See AT&T Mobility prepaid offers at <https://www.att.com/prepaid/index.html>

See Cricket Wireless prepaid offers at <https://www.cricketwireless.com/cell-phone-plans>

Data Request No. 5:

On Tab 7 of the attached spreadsheet, for each product listed on Tab 3, provide additional features/details of the offer.

Response to Data Request No. 5:

Please see Response to Data Request No. 4.

END OF RESPONSE

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

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

Rulemaking 18-07-006

**COMCAST PHONE OF CALIFORNIA, LLC RESPONSE TO PUBLIC ADVOCATES
OFFICE DATA REQUEST NO. 1**

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January 30, 2019

Attorneys for Comcast Phone of California, LLC

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

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

Rulemaking 18-07-006

**COMCAST PHONE OF CALIFORNIA, LLC RESPONSE TO PUBLIC ADVOCATES
OFFICE DATA REQUEST NO. 1**

Comcast Phone of California, LLC (“Comcast Phone”) hereby provides responses to the Public Advocates Office’s First Set of Data Requests (“DR” or “Requests”), issued January 14, 2019. Nothing in this response should be construed as prejudicing or waiving Comcast Phone’s right to produce and provide additional documentary evidence based on information, evidence, or analysis hereafter obtained or evaluated. Comcast Phone’s responses are made subject to inadvertent or undiscovered errors, and are limited by records and information still in existence and or presently recollected and thus far discovered in the course of preparing this response. Comcast Phone reserves the right to update and/or supplement the responses provided herein if and when additional evidence responsive to the Requests becomes available and at any time if it appears that inadvertent errors or omissions have been made.

The objections and responses contained herein are not intended and should not be construed to waive Comcast Phone’s right to object to the DR, or the subject matter of such requests or responses as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, or to other requests for production. Comcast Phone reserves the right to object on appropriate grounds to the use of such information and documents. Comcast Phone hereby fully preserves all of its objections to the DR for any purpose whatsoever.

GENERAL OBJECTIONS

1. Comcast Phone objects to each DR to the extent it purports to seek information regarding services or matters that are not subject to the jurisdiction of the California Public Utilities Commission (“Commission”). The Commission lacks the requisite authority over broadband Internet access services, broadband transmission services, and other IP-enabled services, as set forth in Public Utilities Code Section 710.
2. Comcast Phone objects to each DR to the extent it seeks information beyond the scope of the proceeding A.18-07-006. The *Assigned Commissioner’s Scoping Memo and Ruling* dated November 18, 2018 (“Scoping Memo”) concludes that “affordability issues across Commission-jurisdictional utility services, including water, energy, and telecommunications services, will be considered” in this proceeding. Scoping Memo at 3. This data request seeks information about the price of broadband service, video service, and voice service, which Comcast Phone’s affiliates provide using Voice over Internet Protocol (“VoIP”). Comcast Phone objects to this data request as seeking

information outside the scope of this proceeding as defined by the Scoping Memo. Broadband, video, and VoIP services are not “utility” services or “telecommunications” services within the Commission’s jurisdiction.

3. Comcast Phone objects to each DR to the extent it seeks information regarding rates of video services. The Digital Infrastructure and Video Competition Act of 2006 precludes any attempt by the Commission to regulate rates of service provided by cable companies pursuant to Public Utilities Code § 5820(c).
4. Comcast Phone objects to each DR to the extent it seeks data or information regarding information services, as the Commission’s jurisdiction is limited to telecommunications service.
5. Comcast Phone objects to each DR to the extent it seeks data or information regarding interstate services or from non-certificated affiliates that offer only interstate services, as the Commission’s jurisdiction is limited to intrastate service.
6. Comcast Phone objects to each DR to the extent that it improperly requests or purports to require access to confidential, competitively sensitive, and/or proprietary business and trade secret information belonging to Comcast Phone, its affiliates, or third parties.
7. Comcast Phone objects to each DR to the extent that it seeks the production of information and/or documents that are not readily available to Comcast Phone, or not in Comcast Phone’s possession, custody, or control.
8. Comcast Phone objects to each DR to the extent that it requests the making of a compilation, abstract, audit, or summary of the documents when the burden or expense of preparing or making it would be substantially the same for the Public Advocates Office as it would for Comcast Phone, pursuant to Civ. Proc. Code § 2030.230.
9. Comcast Phone objects to each DR to the extent that it exceeds the requirements of applicable law or purports to impose upon Comcast Phone any obligations broader than those set forth in the California Code of Civil Procedure, the California Public Utilities Code, the Commission Rules of Practice and Procedure, or applicable law.
10. Comcast Phone objects to the DR to the extent it seeks a written verification of responses, on that basis that Public Advocates Office has put forth no valid legal basis for such requirement.

RESPONSES

REQUEST 1

Please list all companies affiliated with Comcast Phone of California, LLC offering products and/or services to residential customers.

SPECIFIC OBJECTION

Comcast Phone objects to this DR on the grounds that it is vague and ambiguous with respect to the phrase “products and/or services.” For purposes of this response, Comcast Phone assumes that the phrase “products and/or services” was intended to refer to voice, video, and Internet products. Comcast Phone further objects to the extent the DR seeks information regarding Comcast Phone’s unregulated affiliates’ operations, on the grounds that the Commission does not have authority to name these entities as a respondents or to compel the production of information from such affiliates. Comcast Phone further objects to this request to the extent it seeks information about VoIP, video, and Internet services, which are outside of the scope of the Commission’s jurisdiction and/or the scope of the present proceeding.

RESPONSE:

Subject to these specific objections and the general objections above, Comcast Phone responds as follows:

Comcast Phone’s affiliates providing voice, mobile, video, and Internet products and/or services to residential customers in California include Comcast Cable Communications Management, LLC, Comcast OTR1, LLC, and Comcast IP Phone, LLC.

SPONSOR:

John A. Gutierrez
Senior Director of Regulatory Affairs for Comcast
(925) 424-0164

REQUEST 2

For each combination of service bundle and download speed for which your company¹ offers at least one product to residential customers during the month of January 2019, please provide the following:

- a. The lowest monthly recurring price (rack rate) for each combination of service bundle and Internet download speed. Exclude sales tax and CPUC mandated surcharges from the

¹“You” includes your company, any affiliates, and subsidiaries.

monthly recurring price. Separately, provide service initiation and installation charges. Separately, provide the amount of price reduction that would result from any available contractual or promotional discounts. Separately, provide amount of price reduction that would result from any discount available to low-income households that is independent of the state or federal Lifeline discount.

- b. If prices for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

If you do not have a residential product at a particular combination of service bundle and speed, please indicate 0. The table below illustrates the combinations of service bundles and speeds.

[original chart omitted]

SPECIFIC OBJECTIONS

Comcast Phone objects to the extent the DR would require it to compile publicly available pricing information when the burden and expense of preparing such a compilation would be substantially the same for the Public Advocate's Office as it would for Comcast Phone. Comcast Phone further objects to the extent the DR seeks pricing information from Comcast Phone's non-jurisdictional affiliates. Pricing for these non-jurisdictional affiliates' services are beyond the stated scope of this proceeding. Moreover, the Commission lacks the requisite authority over the pricing of VoIP and IP-enabled services, as set forth in Public Utilities Code Section 710, and further lacks authority over pricing of video services under Public Utilities Code § 5820(c). The Commission further lacks requisite authority over the interstate and information services about which the DR seeks data.

RESPONSE:

Subject these specific objections and the general objections above, Comcast Phone responds as follows:

Pricing information regarding the non-jurisdictional voice, video, and Internet services of Comcast Phone's various affiliates is publicly available, and set forth online. See <https://www.xfinity.com/learn/offers?pc=1>. The webpage provides pricing and other information for various Internet, TV, and voice service options. Pricing may vary based on geographical location, however, the webpage allows the user to explore pricing by location through use of the "Change" button near the top of the website. Further, the left side-bar of the webpage allows the user to explore various service options and price points. Pricing does not include equipment, installation, taxes or fees, and other applicable charges, however, such fees are disclosed to the customer prior to purchase.

Additionally, Comcast Phone's non-jurisdictional affiliate offers lower-cost home Internet service for eligible residents, at the rate of \$9.95/month for 15 MB downstream speeds, through the Internet Essentials program. See <https://internetessentials.com/>.

SPONSOR:

John A. Gutierrez

REQUEST 3

On Tab 2 of the attached spreadsheet, for each product priced on Tab 1, provide additional features/details of the offer.

RESPONSE:

See objections and response to DR 2, above.

SPONSOR:

John A. Gutierrez

REQUEST 4

For each combination of service bundle and volume (data, minute, text allowances) for which your company² offers at least one product to residential customers during the month of January 2019, please provide the following:

- (on Tab 3 of attached spreadsheet)
- a. The lowest recurring monthly price for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price. Exclude service initiation and installation charges, and assume no promotions or discounts.
 - b. If prices for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

- (on Tab 4 of attached spreadsheet)
- c. The lowest charges for service initiation or installation for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price and assume no promotions or discounts.
 - d. If service initiation or installation charges for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low

² “You” includes your company, any affiliates, and subsidiaries.

range of prices), and describe the market by city/county/census-designated place and/or zip code.

(on Tab 5 of attached spreadsheet)

- e. The price reduction that would be applied for any available contractual promotions or discounts.
- f. If price reductions for contractual promotions or discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

(on Tab 6 of attached spreadsheet)

- g. The price reduction that would be applied for a discount available to low-income customers that is independent of the federal or state Lifeline discount.
- h. If price reductions for low-income discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

If you do not have a residential product at a particular combination of service bundle and speed, please indicate 0. Provide all responses on the specified tabs of the attached spreadsheet. The table below illustrates the combinations of service bundles and volumes. N/a in the table below indicates combinations that are not possible because either voice/text or data is not included.

[chart omitted]

SPECIFIC OBJECTIONS

Comcast Phone objects to the extent the DR would require it to compile publicly available pricing information when the burden or expense of preparing such a compilation would be substantially the same for the Public Advocates Office as it would for Comcast Phone. Comcast Phone further objects to the extent the DR seeks pricing information regarding the non-jurisdictional services of Comcast Phone's affiliates. Pricing for these affiliates' non-jurisdictional services are beyond the stated scope of this proceeding. Moreover, the Commission lacks the requisite authority over the pricing over IP-enabled service, as set forth in Public Utilities Code Section 710, and further lacks authority over pricing of mobile services under 47 U.S.C. § 332. The Commission further lacks requisite authority over the interstate and information services about which the DR seeks data.

RESPONSE:

Subject these specific objections and the general objections above, Comcast Phone responds as follows:

Throughout January 2019, Comcast Phone's affiliate offered Xfinity Mobile services to its Xfinity Internet customers. Xfinity Internet customers, including those in California, could receive up to five Xfinity Mobile lines that included unlimited domestic calling and texting at no

additional charge. Service also included 100 MB of shared data per month with options to purchase additional 4G LTE data for \$12 per shared GB or unlimited data for \$45 per line. There were no service activation or installation charges. Service was postpaid. Regulatory fees and taxes applied.

Service included access to Xfinity WiFi hotspots and allowed for WiFi calling. Customers could bring their own iPhone to use with the service or purchase a phone from Xfinity Mobile. Xfinity Mobile did not offer contracts or discounts on service charges, nor did Xfinity Mobile offer a discount for low-income customers. Xfinity Mobile did, from time to time, offer discounts on device sales, if certain conditions were met. General information on Xfinity Mobile's offerings can be found at <https://www.xfinity.com/mobile/>.

SPONSOR:

John A. Gutierrez

REQUEST 5

On Tab 7 of the attached spreadsheet, for each product listed on Tab 3, provide additional features/details of the offer.

RESPONSE:

Subject to the specific objections set forth in response to DR 4 and the general objections, Comcast Phone responds as follows:

Customer agreements, policies, and service disclosures for mobile services provided by Comcast Phone's affiliate can be found at <https://www.xfinity.com/mobile/policies>.

SPONSOR:

John A. Gutierrez

END OF RESPONSE

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

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

Rulemaking 18-07-006

**COMCAST PHONE OF CALIFORNIA, LLC SUPPLEMENTAL RESPONSE TO
PUBLIC ADVOCATES OFFICE DATA REQUEST NO. 1**

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May 17, 2019

Attorneys for Comcast Phone of California, LLC

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

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

Rulemaking 18-07-006

**COMCAST PHONE OF CALIFORNIA, LLC RESPONSE TO PUBLIC ADVOCATES
OFFICE DATA REQUEST NO. 1**

Pursuant to Public Advocate Office’s (“PAO”) First Set of Data Requests (“Data Requests” or “Requests”), Comcast Phone of California, LLC (“Comcast Phone”) submits the enclosed response (“Supplemental Response”) which supplements the original response served on PAO on January 30, 2019 (“January 30 Response”). This Supplemental Response incorporates by reference all general and specific objections set forth in the January 30 Response.

As background, on March 29, 2019, PAO sent a letter to Comcast Phone’s counsel titled “R.18-07-006 – Meet and Confer Notice.” The letter alleged that Comcast Phone “refus[ed] to answer or fully respond” in its response from January 30, 2019. However the letter did not specify which of the several responses were deficient. In an email dated April 12, 2019, Comcast Phone’s counsel asked PAO to specify which responses PAO seeks further responses. PAO responded and again did not point out any specific questions in the January 30 Response, but stated that PAO sought to meet regarding “any questions in the data request about services they actually provide, but for which they did not provide any answers.”¹ On April 25, 2019, counsel for Comcast Phone and PAO attended a meet and confer (“Meet and Confer”), and Comcast Phone understands from that meeting that PAO would like Comcast Phone to compile pricing data for its affiliates (that is publicly-available online) and add to the chart provided by PAO in the January 14, 2019 data request (“Chart”).

Accordingly, Comcast Phone has attempted to compile publicly-available pricing data in the Chart. This data is current as of January 2019, but such pricing is subject to change as Comcast Phone’s affiliates often change prices based on market conditions. Further, as Comcast Phone noted in the Meet and Confer, PAO’s request to fill out the chart exceeds its jurisdiction and rights to discovery under state law. Moreover, the Chart is both misaligned with how Comcast Phone’s affiliates price services and superfluous given the simple pricing system for certain services, like its mobile service offering. Comcast Phone has not included any marking in Chart cells that are inapplicable, based on guidance from PAO at the Meet and Confer. Comcast Phone has included modifications to the Chart, and explanations to attempt to explain each of the problematic aspects of the Chart and the efforts Comcast Phone has made to work around the problems. Given the many shortcomings of the Chart, there may be instances where Comcast

¹ As stated in the January 30 Response, Comcast Phone does not provide any of the services for which Cal PA seeks information.

Phone has not provided a comprehensive explanation of the response provided, and reserves its rights to supplement the Supplemental Response at a later date.

RESPONSES

REQUEST 1

Please list all companies affiliated with Comcast Phone of California, LLC offering products and/or services to residential customers.

SPECIFIC OBJECTION

Comcast Phone objects to this DR on the grounds that it is vague and ambiguous with respect to the phrase “products and/or services.” For purposes of this response, Comcast Phone assumes that the phrase “products and/or services” was intended to refer to voice, video, and Internet products. Comcast Phone further objects to the extent the DR seeks information regarding Comcast Phone’s unregulated affiliates’ operations, on the grounds that the Commission does not have authority to name these entities as respondents or to compel the production of information from such affiliates. Comcast Phone further objects to this request to the extent it seeks information about VoIP, video, and Internet services, which are outside of the scope of the Commission’s jurisdiction and/or the scope of the present proceeding.

RESPONSE:

Subject to these specific objections and the general objections above, Comcast Phone responds as follows:

Comcast Phone’s affiliates providing voice, mobile, video, and Internet products and/or services to residential customers in California include Comcast Cable Communications Management, LLC, Comcast OTR1, LLC, and Comcast IP Phone, LLC.

SPONSOR:

John A. Gutierrez
Senior Director of Regulatory Affairs for Comcast
(925) 424-0164

REQUEST 2

For each combination of service bundle and download speed for which your company² offers at least one product to residential customers during the month of January 2019, please provide the following:

²“You” includes your company, any affiliates, and subsidiaries.

- a. The lowest monthly recurring price (rack rate) for each combination of service bundle and Internet download speed. Exclude sales tax and CPUC mandated surcharges from the monthly recurring price. Separately, provide service initiation and installation charges. Separately, provide the amount of price reduction that would result from any available contractual or promotional discounts. Separately, provide amount of price reduction that would result from any discount available to low-income households that is independent of the state or federal Lifeline discount.
- b. If prices for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

If you do not have a residential product at a particular combination of service bundle and speed, please indicate 0. The table below illustrates the combinations of service bundles and speeds.

SPECIFIC OBJECTIONS

Comcast Phone objects to the extent the DR would require it to compile publicly available pricing information when the burden and expense of preparing such a compilation would be substantially the same for the Public Advocate's Office as it would for Comcast Phone. Comcast Phone further objects to the extent the DR seeks pricing information from Comcast Phone's non-jurisdictional affiliates. Pricing for these non-jurisdictional affiliates' services are beyond the stated scope of this proceeding. Moreover, the Commission lacks the requisite authority over the pricing of VoIP and IP-enabled services under state and federal law and further lacks authority over pricing of video services under Public Utilities Code § 5820(c). The Commission further lacks requisite authority over the interstate and information services about which the DR seeks data.

RESPONSE:

Subject these specific objections and the general objections above, Comcast Phone responds as follows:

Pricing information regarding the non-jurisdictional voice, video, and Internet services of Comcast Phone's various affiliates is publicly available, and set forth online. See <https://www.xfinity.com/learn/offers?pc=1>. The webpage provides pricing and other information for various Internet, TV, and voice service options. Pricing may vary based on geographical location, however, the webpage allows the user to explore pricing by location through use of the "Change" button near the top of the website. Further, the left side-bar of the webpage allows the user to explore various service options and price points. Pricing does not include equipment, installation, taxes or fees, and other applicable charges, however, such fees are disclosed to the customer prior to purchase.

Additionally, Comcast Phone's non-jurisdictional affiliate offers lower-cost home Internet service for eligible residents, at the rate of \$9.95/month for 15 MB downstream speeds, through the Internet Essentials program. See <https://internetessentials.com/>.

SUPPLEMENTAL RESPONSE:

Subject to the specific objections and the general objections above, Comcast Phone responds as follows:

The Response excludes certain bundles, such as bundles that customers may create by matching together products as well as instances in which multiple options are available at a given speed tier designated in the Data Request. Below are the prices offered in the vast majority of California footprint.³

Broadband download speed	Fixed broadband (standalone)	Fixed broadband + fixed voice	Fixed broadband + TV	Fixed broadband + fixed voice + TV	Fixed broadband + mobile voice
10-29 Mbps	\$51.95; promotion: (\$29.99 x 12 months)				<i>See Response to DR 4, below.</i>
30-99 Mbps	\$66.95; promotion: (\$39.99 x 12 months)	\$69.95; promotion (\$59.95 x 24 months))	\$75.95; promotion (\$44.99 x 12 months))		
100-199 Mbps	\$81.95; promotion: (\$54.99 x 12 months)		\$100.00; promotion (\$69.99 x 12 months)	\$120.00; promotion (\$89.99 x 12 months))	
200-999 Mbps	\$96.95; promotion: (\$69.99 x 12 months))			\$140.00; promotion: (\$109.99 x 12 months)	
1-2 Gbps	\$126.95				
2+ Gbps	\$299.95				

SPONSOR:

John A. Gutierrez

³ While there is some geographical variability of pricing for Xfinity services, pricing is consistent throughout the vast majority of the footprint, and the lowest rack rate for standalone Xfinity Internet service is constant throughout the entirety of the footprint in California.

REQUEST 3

On Tab 2 of the attached spreadsheet, for each product priced on Tab 1, provide additional features/details of the offer.

RESPONSE:

See objections and response to DR 2, above.

SUPPLEMENTAL RESPONSE:

Subject the specific objections set forth in response to DR 2 and the general objections above, Comcast Phone responds as follows:

Comcast Phone has listed requested information regarding the lowest rack rate for Xfinity Internet.

Product Name: Performance Starter

- Question: Amount of price reduction that would result from any available contractual or promotional discounts. If the price reduction varies by geographic market, provide the price reduction for three sample markets as described in 4.h.A.
 - Answer: *See* Chart, for promotional pricing.
- Question: Amount of price reduction that would result from any discount available to low-income households that is independent of the state or federal Lifeline discount.
 - Answer: *See* Response to DR 2, above.
- Question: Geographical coverage area in which product is offered?
 - Answer: Generally available throughout the service territory
- Question: Is a wireline telephone line or TV subscription required for service?
 - Answer: No.
- Question: Identify the Internet Technology type (limit your answers to the following: xDSL, cable, FTTx, Ethernet, plug and play, satellite, combination, other.)
 - Answer: Cable
- Question: Advertised download speed - bitrate (Kbps)
 - Answer: Either 15 Mbps or 25 Mbps, depending on region
- Question: Gigabytes (GB) of data included per month
 - Answer: 1 Terabyte of data per month
- Question: If limited by time, hours/minutes included per month
 - Answer: N/A
- Question: Type of penalty for exceeding data cap (answers may include the following: continued reduced service, disconnect, automatic surcharge, other, none)
 - Answer: automatically add blocks of 50 GB for an additional fee of \$10 each
- Question: Reduced speed after exceeding limit (Mbps)
 - Answer: N/A
- Question: Is an email accounts/address included?
 - Answer: up to 7
- Question: Does the service include a hosted website/page for the customer?

- Answer: No
- Question: Service plan level of protection (e.g., antivirus, antispam, no protection, other)
 - Answer: Yes, Norton Security Online.
- Question: Contract duration (months)
 - Answer: Varies
- Question: Termination charge
 - Answer: Yes, decreasing over the time of the contract.

SPONSOR:

John A. Gutierrez

REQUEST 4

For each combination of service bundle and volume (data, minute, text allowances) for which your company⁴ offers at least one product to residential customers during the month of January 2019, please provide the following (on Tab 3 of attached spreadsheet):

- a. The lowest recurring monthly price for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price. Exclude service initiation and installation charges, and assume no promotions or discounts.
- b. If prices for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

(on Tab 4 of attached spreadsheet)

- c. The lowest charges for service initiation or installation for each combination of service bundle and volume (data, minute, text allowances). Exclude sales tax and CPUC mandated surcharges from the monthly recurring price and assume no promotions or discounts.
- d. If service initiation or installation charges for a product offering vary by geographic market, provide prices for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

(on Tab 5 of attached spreadsheet)

- e. The price reduction that would be applied for any available contractual promotions or discounts.

⁴ “You” includes your company, any affiliates, and subsidiaries.

- f. If price reductions for contractual promotions or discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

(on Tab 6 of attached spreadsheet)

- g. The price reduction that would be applied for a discount available to low-income customers that is independent of the federal or state Lifeline discount.
- h. If price reductions for low-income discounts vary by geographic market, provide price reductions for three sample markets in California (at the high, mid and low range of prices), and describe the market by city/county/census-designated place and/or zip code.

If you do not have a residential product at a particular combination of service bundle and speed, please indicate 0. Provide all responses on the specified tabs of the attached spreadsheet. The table below illustrates the combinations of service bundles and volumes. N/a in the table below indicates combinations that are not possible because either voice/text or data is not included.

[chart omitted]

SPECIFIC OBJECTIONS

Comcast Phone objects to the extent the DR would require it to compile publicly available pricing information when the burden or expense of preparing such a compilation would be substantially the same for the Public Advocates Office as it would for Comcast Phone. Comcast Phone further objects to the extent the DR seeks pricing information regarding the non-jurisdictional services of Comcast Phone's affiliates. Pricing for these affiliates' non-jurisdictional services are beyond the stated scope of this proceeding. Moreover, the Commission lacks the requisite authority over the pricing over IP-enabled service, as set forth in Public Utilities Code Section 710, and further lacks authority over pricing of mobile services under 47 U.S.C. § 332. The Commission further lacks requisite authority over the interstate and information services about which the DR seeks data.

RESPONSE:

Subject these specific objections and the general objections above, Comcast Phone responds as follows:

Throughout January 2019, Comcast Phone's affiliate offered Xfinity Mobile services to its Xfinity Internet customers. Xfinity Internet customers, including those in California, could receive up to five Xfinity Mobile lines that included unlimited domestic calling and texting at no additional charge. Service also included 100 MB of shared data per month with options to purchase additional 4G LTE data for \$12 per shared GB or unlimited data for \$45 per line. There were no service activation or installation charges. Service was postpaid. Regulatory fees and taxes applied.

Service included access to Xfinity WiFi hotspots and allowed for WiFi calling. Customers could bring their own iPhone to use with the service or purchase a phone from Xfinity Mobile. Xfinity Mobile did not offer contracts or discounts on service charges, nor did Xfinity Mobile offer a discount for low-income customers. Xfinity Mobile did, from time to time, offer discounts on device sales, if certain conditions were met. General information on Xfinity Mobile's offerings can be found at <https://www.xfinity.com/mobile/>.

SPONSOR:

John A. Gutierrez

REQUEST 5

On Tab 7 of the attached spreadsheet, for each product listed on Tab 3, provide additional features/details of the offer.

RESPONSE:

Subject to the specific objections set forth in response to DR 4 and the general objections, Comcast Phone responds as follows:

Customer agreements, policies, and service disclosures for mobile services provided by Comcast Phone's affiliate can be found at <https://www.xfinity.com/mobile/policies>.

SPONSOR:

John A. Gutierrez

END OF RESPONSE