



9260 E. Stockton Blvd.
Elk Grove, CA 95624

Sent via Email

January 30, 2017

Mike Amato
Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94105

Re: Comments on Resolution T-17548 C -- Digital 299 CASF Grant to Inyo Networks Inc.

In accordance with Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission ("CPUC") Frontier California Inc. (U-1002-C) ("Frontier") hereby submits comments on Draft Resolution T-17548 issued December 23, 2016, which would award Inyo Networks Inc. ("Inyo") an infrastructure grant of \$41,780,141 from the California Advanced Services Fund ("CASF") for middle-mile and last-mile broadband facilities along Highway 299 in northern California.

Frontier supports award of a CASF grant to Inyo to construct the Digital 299 middle-mile facilities, and last-mile facilities to 307 households, as described in the Draft Resolution. Frontier agrees with the Draft Resolution's conclusion that this project has great potential to provide economic and other public benefits from providing high-speed Internet access to residents and communities along the Highway 299 corridor. This project also would enable Frontier to access middle-mile facilities to connect households in its nearby service areas where Frontier intends to expand broadband access under the Federal Communications Commission ("FCC") Connect America Fund II ("CAF II") program. However, the Draft Resolution should be modified to (1) remove provisions that impermissibly award CASF funds for cell towers, and (2) make factual and technical corrections in the description of Frontier households contained in the original application.

Background on Frontier Challenge

On April 1, 2016, Frontier assumed operation of the landline operations of Verizon California Inc., including several service areas along or near Highway 299 that currently lack broadband access. The CPUC approved the Frontier-Verizon transaction in D.15-12-005, which ordered Frontier to accept obligations and funding from CAF II. After April 1, 2016, Frontier had access to the network details of former Verizon service areas and began planning its CAF II broadband investments. Frontier subsequently notified CPUC staff about a CAF II priority project that overlaps the proposed project location in the Inyo Digital 299 application and submitted a

challenge. After discussions with CPUC staff and Inyo, the Frontier households eligible for CAF II were removed from the Inyo application.

Award of CASF Funds for Cell Towers Is Legal Error

The CASF program is authorized by Public Utilities Code Section 281 to provide funding for deployment of broadband infrastructure to households, with a priority to projects that provide last-mile broadband access to households that are unserved by an existing facilities-based broadband provider. CPUC decisions implementing the statute also allow awards for middle-mile projects where the applicant demonstrates, and the CPUC determines, that middle-mile facilities are “indispensable” to reaching unserved and/or underserved households. Specific, detailed application requirements and evaluation criteria for last-mile and middle-mile projects are set forth in D.12-02-015. The Draft Resolution Finding No. 10 and Ordering Paragraph No. 2 conclude that the Inyo Digital 299 project and the award of \$41,780,141 to Inyo meets the requirements of D.12-02-015.

Included within this \$41.7 million award to Inyo is \$3.1 million for approximately 15 cell tower sites at unspecified locations in the Digital 299 project area. As described in the “Financial Viability” discussion on pages 7 to 8 of the Draft Resolution, Inyo amended its original application to request this funding to construct cell tower sites, not for the purpose of Inyo providing cell service, but for Inyo to sell backhaul and tower space to existing cell service providers. The stated justification for this use of CASF funds is that it will (1) help address the very poor cellular telephone service along the Highway 299 corridor and thereby also improve public safety, and (2) create another revenue source for Inyo to help make the Digital 299 last-mile and middle-mile project more financially viable.

Frontier asserts that the CPUC is not authorized under Section 281 to award CASF funds for improving cellular service in this manner. The Legislature has authorized collection of customer surcharges for the CASF program to fund broadband infrastructure deployment to households lacking high-speed Internet access, not to improve cellular telephone service. Any potential for these cell towers to enable mobile broadband service to households is speculation given, as the Draft Resolution acknowledges, that the number and placement of towers is undetermined. Nor is there any assertion by the applicant, or evaluation by the CPUC, as to whether the cell towers are “indispensable” middle-mile facilities. Indeed, the Draft Resolution does not analyze the cell towers under the specific and detailed criteria in D.12-02-015 for either last-mile or middle-mile facilities. As a threshold matter, this would need to include evaluation of whether the proposed service area is underserved or unserved, and no specific service area or households are identified here. It is conceivable that the cell tower service area could even overbuild the broadband service of this very project. The proposed cell towers simply fall outside the scope of projects authorized for CASF funding.

Moreover, the stated purpose of potentially helping Inyo generate revenue to improve the financial viability of Digital 299 does not make the award of CASF funds for cell towers permissible. Accordingly, Frontier asserts that the Draft Resolution Finding No. 10 and Ordering Paragraph No. 2 contain legal error because the award of \$3.1 million to Inyo for cell towers is not authorized under Section 281 and D.12-02-015.

CPUC Has Other Alternatives to Address Financial Viability

While objecting to award of cell towers to improve financial viability of the Digital 299 project, Frontier urges the CPUC to seek other alternatives within its authority to achieve that goal. Frontier is very familiar with the challenges of serving the rural, remote and sparsely populated areas along Highway 299. As the Draft Resolution states on page 11, the Digital 299 project “is very costly in totality and on a per-household basis.” To address these high costs, the CPUC could potentially make adjustments to other variables, such as speed and pricing. The Draft Resolution states that the proposed speed is about 167 times the minimum 6/1.5 Mbps benchmark set by the CPUC, offering the fastest speed of CASF middle-mile projects. The Draft Resolution at pages 8-9 describes the monthly service price as receiving the CASF program’s highest historical score in the category of pricing. Thus, this project proposes to provide the fastest speed at the lowest price.

In addition, the CPUC could address financial viability by adjusting the percent of the project funded. Although D.12-02-015 established the 60% for underserved and 70% for unserved funding standard, the CPUC has provided a higher funding level for some projects. For example, in Resolution T-17429 the CPUC awarded a CASF grant to fund 80% of a middle-mile project costs. As California moves toward expanding broadband to the remaining corners of the state lacking high-speed Internet access, such as the Highway 299 corridor, where the costs of deployment are extremely high, award of CASF funds to cover a higher percent of project costs should be considered.

Factual and Technical Corrections

On page 6, the Draft Resolution describes Frontier’s plans to expend CAF II funds to provide broadband access to households removed from the Inyo application at the CAF II minimum speed of 10 mbps down and 1 mbps up, and also states the following with citation to Frontier’s October 7, 2016 letter: “Frontier also committed to find ways to upgrade the speed of any households in the area that would not meet the California standard of 6/5.1 after the CAF II work, including the possibility of applying for a CASF grant.” This statement paraphrases Frontier’s letter as stating an absolute commitment to upgrade the speed to any household, and should be corrected to be consistent with the following statement in Frontier’s letter:

“In addition to meeting FCC requirements for this CAF II build, Frontier is considering all options to extend the build to non-CAF II households and to increase available broadband speed, especially to anchor institutions in these exchange areas. The next round of CAF funding for very high cost households and a potential CASF grant are among options to further expand broadband access and speed. Frontier is committed to working with stakeholders and community leaders to access all available resources to help close the Digital Divide in the Highway 299 area.”

On pages 7-8, the “Financial Viability” section of the Draft Resolution describes revenue Inyo expects to earn from cell towers and states: “Money earned through those sales would help offset income forgone by not connecting last-mile households Inyo gave up as a result of challenges.” This statement should be corrected to refer to these households as “...last-mile households

removed from Inyo's application because they are CAF II eligible households in Frontier's service area."

In summary, Frontier supports award of a CASF grant to Inyo to construct the Digital 299 middle-mile facilities, and last-mile facilities to 307 households, provided the award in the Draft Resolution is modified to (1) remove provisions that impermissibly award CASF funds for cell towers, and (2) make factual and technical corrections in the description of Frontier households contained in the original application. Frontier also encourages the CPUC to consider alternatives to address the financial viability of this project so that the residents and communities along the Highway 299 corridor will realize the economic and other public benefits of expanded broadband access.

Respectfully submitted,



Charlie Born

Manager, Government & External Affairs

CERTIFICATE OF SERVICE

I certify that this day I served by e-mail a copy of the “**Comments on Resolution T-17548 C -- Digital 299 CASF Grant to Inyo Networks Inc.**” to the parties on the service list attached to the draft resolution.

January 30, 2017 at Elk Grove, California



Pam Pittenger
Frontier Communications

**Service List for Resolution T-17548
as of 1/24/17**

CASF Distribution List

a.lauritzen@iwvisp.com
aaron@fullspectrumia.com
aaron@thouse.com
aayala@wwmsolutions.com
abloom@ldxx.com
ac4@cpuc.ca.gov
acardin@digitalpath.net
accounting@321communications.com
accounting@ez-netsys.net
accounting@splicetelecom.com
accounting@uspcom.com
accountspayable@broadbandtele.net
acopeman@ldcb.com
adam@smarterbroadband.com
adam@telcoexperts.com
adilia@cleartalk.net
admin@calling10.com
admin@empyrewireless.com
admin@hellodial.com
admin@velocityatt.com
AdminCoordinator@MendocinoBroadband.org
adnan.shoaib@tierzero.com
aeconomou@mettel.net
afernandez@tminc.com
ag@aceinnovative.com
agertsburg@infotelecom.us
aglenn@compliancepartners.net
agnes.ng@att.com
ahernandez@accela-inc.com
aj1@cpuc.ca.gov
ajc@cpuc.ca.gov
ajohnson@sanbruno.ca.gov
al@sunmicrowave.com
Al_Mayerhoff@nyigc.com
ALEE@accessoneinc.com
alee@btigroup.com
alex@ldpost.com
alex@payphone211.com
Alex@race.com
Alexander@ethericnetworks.com
alice.glasner@cpuc.ca.gov
alok.mathur@hughes.com
amaimon@mediacomcc.com
amb@care-ems.com
an82778@yahoo.com
andre@broadvox.net
Andrew.RuizdeGamboa@Spacenet.com
andrieu@TELNA.com
angel@firelinebroadband.com
angela.hoke@birch.com
angela.pierce@trillion.net
Angela.Young@cpuc.ca.gov
Angelica.Morales@sce.com
anita@icommlaw.com
anitataffrice@earthlink.net
anthony.delarosa@thomsonreuters.com
anthony@vistabroadband.com
ap@allvoi.com
araksiya@connectto.com
ARAM.GABRIELIAN@INTERNET.COM
aram@Connectto.com
arasura@tcastcom.com
ari@phone.com
ari@phonepower.com
arianazur@hotmail.com
arlee.holt@mymti.com
art@smiwifi.com
ashar@telecircuit.com
ashm@telepacific.com
Asia.powell@ftr.com
asj@calcable.org
asouder@gettingair.com
atreder@bossys.com
ats@ats-firstcall.com
att-regulatory-ca@att.com
azabit@telekenex.com

azim@raza.com
bankim@bridgevoice.net
barbee.ponder@globalstar.com
barry.friedman@thompsonhine.com
barry@hdn.net
bart@digitaldune.net
bbeaty@impacttelecom.com
bblair@affinitymobile.com
ben.a@primold.com
ben.hulet@mlode.com
beth@gsaudits.com
betty.sanders@chartercom.com
bev@tahoeprosperity.org
beverly.howe@gafachi.com
bgantner@paxio.com
bhackett@gtl.net
bhoover@pinttopointinc.com
bhorn@winters-broadband.com
bhorton@innovativeitinc.com
Bill.Mueller@valleyvision.org
bill@omniwerx.com
billh@volcanotel.com
billing@tierzero.com
bnusbaum@turn.org
bob.huff@deltel.com
bob@useatmc.com
bobbi@visiology.com
bperna@customteleconnect.com
brad@riptidewireless.com
brad@ucsc.edu
brbranson@lonepinetv.com
breeve@o1.com
brendan.kasper@vonage.com
brent@sedcorp.biz
brian@sbc-wireless.com
brianb@abgcapital.com
brobinson@cambaygroup.com
bruce.hakimi@cybernetcom.com
Bruce.Ross@asm.ca.gov.
bruce.stenslie@edc-vc.com
bruce@cybernetcom.com
bryan@cot.net
bsimmons@iprise.com

bsteffen@catalinabb.com
bthornton@marinjpas.org
buenaluz@ztg.net
butler@eot.net
bwilde@creatint.com
bwilfert@ccicom.com
byung@telava.com
callplanusa@q.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
Carlos@race.com
carol.denton@thomsonreuters.com
carolp@alliancegrp.com
carrie.rice@hickorytech.com
casie.isaacs@thomsonreuters.com
cat@airespring.com
cbridgeman@psrec.coop
cc2@cpuc.ca.gov
ccie4140@gmail.com
ccook@telesphere.com
cdevenney@mediacomcc.com
celeste.eckroat@usad.com
ceo@empyrewireless.com
cerickson@acinet.com
cerwin@psrec.coop
ces54@humboldt.edu
cfilak@calltower.com
cforst@360.net
cfritz@nextiva.com
cg2@cpuc.ca.gov
cgibson@csptelecom.com
cgiles@cuwireless.com
chabran@cctpg.org
Chad.jones@vocalipx.com
chantel.mosby@centurytel.com
charles.forst@360.net
charlie.born@frontiercorp.com
Charlie.Born@ftr.com

cheryl@wtild.com
CHLSolutions@msn.com
chopfinger@securustech.net
Choua.Her@mossadams.com
chris@connectionportal.com
christie@usa-companies.net
Christine.Burke@FTR.com
christopher.murphy@viasat.com
Christopher@Newrules.org
chuang@cinergycom.com
cindy.manheim@cingular.com
cityattorney@ci.watsonville.ca.us
cjasty@gmail.com
ckonrad@ldxx.com
cl@sandiegobusiness.org
clare.mcneil@quicktelusa.com
clcc@race.com
CLECOPS@alec.net
clenno@csumb.edu
cliff.jackson@mybighthouse.com
clisowski@commpartnersconnect.com
clomonaco@csufresno.edu
clovell@blueroostertelecom.com
cmailloux@turn.org
cmalone@halowireless.com
cmei722@gmail.com
cmemerson@csuchico.edu
cmermerson@csuchico.edu
cneeld@tminc.com
cnutting@csufresno.edu
commercexpo@aol.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
Corporatestaff@ruralwest.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
cs@telecircuit.com
csmith@wsteleport.com
cstein@dominionbusinessgroup.com
cstewart@ipnetworksinc.com
curtis@com-pair.net
customer@pulsetele.com
cynthia.mcreynolds@cpuc.ca.gov
d.fasano@ntta.com
daguirre@telscape.net
dan@outbackinternet.com
dand@ponderosatel.com
dane@sonic.net
Danielle@freedomvoice.com
danielm@lacuracao.com
danielr@abgcapital.com
DanR@goldenstatecellular.com
darren.mass@masscommgroup.com
darren.pesce@cvtpprepaid.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
david.robinson@syniverse.com
david@wwtelecom.net
david@budgetprepay.com
davidmoon@posdata.co.kr
davidw@jointventure.org
dbaker@centraltelecomlongdistance.com
dbaker@ustelecomld.com
dbell@digitalpath.net
dbernstein@unison.com
dbforslund@gmail.com
dbigge@ethericnetworks.com

dblack@grid4.com
dcarney@hypersurf.com
DCHEN@owtel.com
dclark@kermantelephone.com
dclark@sebastiancorp.com
dcollier@kajeet.com
ddaigle@freedomdarkfiber.com
ddcurtis@wecare.net
ddicicco@gcioa.com
dean.dalzell@zayo.com
debbie@octagonprepaid.com
debbiepe@stcg.net
debi@caltel.com
del.heintz@chartercom.com
dennis.moffit@suddenlink.com
devcomm@aol.com
devins@pcs1.net
deyoung@caltel.org
dforster@tminc.com
dgwood@iwvisp.com
diallongdistance@aol.com
diana.peneva@tatacommunications.com
diane.peters@globalcrossing.com
djiron@flatwireless.com
dkdenney@integratelecom.com
dmarcus2@sbcglobal.net
dmeldazis@peerlessnetwork.com
dmerritt@merrittcomm.com
dnelson@cvin.com
dnelson@instantphone.org
don.davis@proximiti.com
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
dramsey@mcn.org
drodriguez@ypiusa.org
dsc@cpuc.ca.gov
dscott@globalvad.com
dsl@frazmtn.com

dslingerland@ypiusa.org
dsmat@inetworkgroup.com
dsmat@inetworksgroup.com
dsong@nexgit.com
dspitler@ethericnetworks.com
dt@wci.com
dward@tsicorp.net
dweirich@8x8.com
DWTCPUCKETTS@dwt.com
earlb@volcanotel.com
ebender@wilcon.com
ebustamante@us.telefonica.com
ecanicoso@aptele.com
ece.okar@cnxntech.com
ecortez@wavebroadband.com
ecutright@karuk.us
eddie.mishan@emsonusa.com
edorm@cot.net
edwardoneill@dwt.com
edwin@janaslani.com
efi@flatplanetphone.com
egwolfe@ducortelco.com
ehiggins@corp.digitalpath.net
Eileen.Odell@cpuc.ca.gov
Einfo@entelegent.com
eitan@dollarphone.com
Elisa.Lamberty@Spacenet.com
elise.brentnall@lcbcom.com
emarzullo@sbrda.org
emre.kosmaz@kosmaz.com
enriqueg@greenlining.org
equimper@uniontelecomusa.com
eric@suttercreek.com
erin@solstice-gis.com
ERNEST@ONESOURCENETWORKS.COM
eschweizer@cogentco.com
esears@globaltouchtelecom.com
esears@xcastlabs.com
esther.northrup@cox.com
ethomas@freedomvoice.com
evotaw@ducortelco.com
evw@cpuc.ca.gov
expresstel@sbcglobal.net

ezequiel.vega@cityofwatsonville.org
fabboud@spacenetllc.com
fabiola@allo.com
fcc@pcwi.net
FILABELLE@SANPHONECISCO.COM
finance@telmate.com
finance@thinkingphones.com
fmeng@vertextelecom.com
foisy@bellsouth.net
ForestJames@EnerTribe.com
frank@x2telecom.com
fred.ramer@peakcomm.com
fred@nexvortex.com
fredmrd@pacbell.net
FUJISHIMA@DOCOMOUSA.COM
g5admin@c-zone.net
gail.long@tdstelecom.com
gal@vUnity.com
gary.barlow@tonservices.com
gary@medalliontelecom.com
gary@wcvad.com
garyj@nationalbrands.com
gblack@cwclaw.com
gcosta@betterworldtelecom.com
geln.semow@cpuc.ca.gov
genedry@razorline.com
George.Connott@DPIEnergy.com
George.lucero@megapath.com
george.thomson@ftr.com
george@aw-co.com
george@myifp.com
george@totel.com
georges@axint.net
gerard.ainsztein@americantower.com
geri@olscomm.com
g-gunsalus@mindspring.com
ghogan@symtelco.com
gil@ncerc.org
GKarish@millervaneaton.com
gknight@sdfutures.org
Gladys.Palpallatoc@cetfund.org
glenn.richards@pillsburylaw.com
glim@enpointe.com

gmcglynn@nti.us
gmeyer@ygnition.com
goose@beamspeed.com
gpelzer@pelzercom.com
gphone@gphone.com
grant.spellmeyer@uscellular.com
Greg.Diamond@Level3.com
greg.m@socaltelephone.com
greg.m@wholesaleairtime.com
greg.rogers@level3.com
greg@digizip.com
greg@fogeatersinc.com
greg@wholesaleairtime.com
gregl@goait.com
gregory.castle@att.com
groberts@800response.com
grodham@diversifiedconsulting.net
grs@cpuc.ca.gov
gsatserv@sbcglobal.net
gspriggs@cityofplacerville.org
gvc@cpuc.ca.gov
gwilson@impulse.net
haff.enterprises@gmail.com
hando@canditech.net
hans@starfone.net
harlynf@npgco.com
hd@lucasvalley.net
heather.gibbs@deltacom.com
heidi@xyncom.com
henry@com-impact.com
hmorales@skyriver.net
hmoss@freespark.com
hong.ji@airnex.com
hpaulin@tconetwork.com
hstringer@tminc.com
hyepin@gmail.com
iho@opentel.com
info@acelere.net
info@aircloud.com
info@chiconet.com
info@clearchoicepcs.com
info@cogentco.com
info@currentgroup.com

info@dollarphone.com
info@integratedserv.com
info@intermetro.net
info@myatel.com
INFO@NHCGRP.COM
info@norstartelecom.com
info@novatelnetworks.com
info@pointtopointinc.com
info@pulsarco.com
info@spectralnetworks.com
info@speedband.com
info@springvillewireless.com
info@tsunami-wireless.com
info@vinatouch.com
info@windjammercable.com
info@wsteleport.com
info@ztelephony.com
ingrid.galyan@fnf.com
irena@vocalipx.com
isaacs@isg-telecom.com
israel@globecomintl.com
israel@livetel.com
issa@qlinkwireless.com
it_director@bearrivertribe.com
itmanager@towerstream.com
jack.liu@chtglobal.com
Jacob.Barlow@CenturyLink.com
jacque.lopez@verizon.com
jahall@corp.earthlink.com
James.Lehrer@sce.com
james.mackenzie@quortechequities.com
james.mertz@hypercube-llc.com
james.t.meister@windstream.com
james@ipcomms.net
james@northcoastnet.com
Janae.WalkerBronson@americantower.com
janewhang@dwt.com
jarrett@smartchoiceus.com
jason.brown@accesspointinc.com
Jason.Sophinos@viasat.com
jason@convergence.com
jason@convergencesys.com
jason@remotelylocated.com

jay@allcompass.com
jbarghouthi@intelepeer.com
jbeausoleil@o1.com
jbeausoleil@vayatelecom.com
jbj@cpuc.ca.gov
jborchelt@gmail.com
jbrown@vcomsolutions.com
jbubar@aol.com
jcarroll@equinoxcorp.com
jclark@gmssr.com
jcrowe@uscable.com
jcui@corp.earthlink.com
jcv@vosburgtechcenter.com
jdaniels@tsigrp.net
JDaniels@ustelestis.us
jdogonas@cenic.org
jdollenmayer@pngmail.com
jean.lee@hellodial.com
Jeff.Carlisle@lightsquared.com
jeff.jang@openpop.com
jeff.wirtzfeld@qwest.com
JELISI@SBCGLOBAL.NET
Jeni.Santana@T-Mobile.com
jennh@velociter.net
jenni.partridge@stiprepaid.com
jennifer.hinojosa@infonxx.com
jennifer.kashatus@dlapiper.com
jennifer.lautenschleger@tdstelecom.com
jennifer@ovctelecom.com
jeremy.bals@usacomcommunications.tv
jesus.g.roman@verizon.com
jgilliland@cvctermination.com
jh@mymti.com
jh@qtelephone.com
jh@sandiegobusiness.org
jharper@broadviewnet.com
jhawley@fh2.com
jhawley@technet.org
JIANHUA.MA@VERIZONWIRELESS.COM
jim.brownfield@radical.com
jim.comeaux@vintalk.com
jim@coremarkinc.com
jimwilliby@yahoo.com

jj@bigrivertelephone.com
jjcraddock@conterra.com
jklapper@dialink.com
jkorn@storesonline.com
jkrutchik@ststelecom.com
jlane@cal.net
jlawson@adtech-it.com
jlm@mcn.org
jmaadi@intouchamerica.com
jmancuso@clearworld.net
jmauldin@adamsbroadwell.com
jmccarthy@nextwave.com
jmills@utilitytelephone.com
jmulvehill@5linx.com
jn@consumertelcom.com
joan.m.engler@verizon.com
Jodi.Mulligan@valleyvision.org
Joe.Chicoine@ftr.com
joe.dunbar@verizonbusiness.com
joe.topel@orange-ftgroup.com
joe@ccitelcom.com
joelstaker@cityofwatsonville.org
johara@anpi.org
johara@anpolutions.com
john.e.owens@gm.com
john.pandolfi@interfacesys.com
JOHN@RELIANTBROADBAND.US
john@Spiralinternet.com
john@tcomconsultants.net
john_gutierrez@cable.comcast.com
johnbarnicle@yahoo.com
johng@unitelgroup.com
Johnj@Rapidlink.com
johnj@telenational.net
johnm@consumercellular.com
johns@pcs1.net
jokoneski@pst.coop
jon@LDAccess.com
jon@morenotrenching.com
jorgeaoki@mcblue.com
jose.camacho@windstream.com
jparker@credomobile.com
jparker@wafs.com

jpena@rgts.com
jpenney@wavebroadband.com
jpetrakis@acc2go.com
jreed@edenhousing.org
jrenneker@nos.com
jrhoden@infostructure.net
jriley@telecompliance.net
jrotman@ciphernetworks.ca
jrtkyu@gmail.com
jstaker@ci.watsonville.ca.us
jtlowers@sisqtel.net
judypau@dwt.com
julie.laine@twcable.com
justinthomasoneill@gmail.com
jvillanueva@cleartel.com
jwakefield@covad.com
jwaters@csufresno.edu
jwest@linesystems.com
jwilcox@jwecorp.com
kaljar@qnet.com
kar@cpuc.ca.gov
karen.pearl@lightyear.net
karp@humboldt.edu
kathy.campbell@cinbell.com
kathy@isphone.net
kcwilsonii@gmail.com
kdaniel@horizoncable.com
KDu@abs-cbni.com
keeshugo@calbroadband.com
keith@preferredlongdistance.com
kellingson@wavebroadband.com
kelly@northlandco.com
kelly_c@co.lake.ca.us
kelvin.hong@newworldtel.com
Ken.Clements@DodsonGroup.net
ken@fastblue.com
kenneth.knapp@mhonetnetworks.com
kenny@calmtel.com
kerry@closecall.com
kevin@socaltelephone.com
kevin@softcom.net
KevinM@tcoe.org
KevinM@visalia.net

kevins@anzaelectric.org
kfennell@broadvox.com
kflock@cabrilloedc.org
kfranks@lifeline.net
kgarnett@cal.net
kgeuder@tminc.com
kgorey@bcntele.com
khavins@broadbanddynamics.com
khbae@sunycell.com
KHoff@fire2wire.com
Kim.Do@megapath.com
kimm.partridge@ucn.net
kipc@broadweave.com
Kirby@caltel.com
kjl@cpuc.ca.gov
kjohnston@bctconsulting.com
kkchoi@roadwaycom.com
kl@sandiegobusiness.org
klepper@nadoctors.net
KMcdine@cpvcom.com
KMCDONALD@T2TECHNOLOGIES.COM
kmcha@enjoyandtv.com
kperkins@rtcli.net
kperkins@rtcllc.com
kperkins@rtcllc.net
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
kyork@sierrabusiness.org
l.lupton@surewest.com
lakishat@budgetprepay.com
lalvarez@alvareztg.com
larry@northcoast.com
larry@speedypin.com
larryl@isgcom.com
larrylevine@pacifictelephonecompany.net
latwood@its-omni.com
latwood@itstelecom.com

laura@mayhooklaw.com
laurabsherman@yahoo.com
Lauren@gotwifi.com
laurie.miller@tnzi.com
lbranson@lonepinetv.com
lchai@cnsny.net
LCires@inphonex.com
ldbbaseinc@aol.com
ldc@ldctele.com
ldeesing@riverside.ca.gov
ldellaero@matrixbt.com
ldellaero@trinsic.com
lderme@bbcominc.com
lderne@bbcominc.com
lee@ibsinc.com
legal@amphone.com
legal@mygtc.com
legal@ringcentral.com
legal@vbonita.com
leog@getatc.com
leon@positivetele.com
Lesla@calcable.org
lesley.cooper@spacenet.com
Lezlie.P.Young@windstream.com
linda.c.stinar@centurylink.com
Linda.cicco@bt.com
linda.hunt@lightyear.net
linda.k.joseph@embarq.com
linda.parks@americanmessaging.net
Linda.Peng@comnet-telephone.com
lindab@stcg.net
linda-best@comcast.net
Lisa.Ludovici@charter.com
lisa.prigozen@cpuc.ca.gov
lisa@cicom.net
Lisa_moglia@cable.comcast.com
ljfreeman@bandwidth.com
lmandolini@edenhousing.org
lmb@cpuc.ca.gov
lmb@wblaw.net
lorrie.bernstein@mossadams.com
lortega@communityunion.org
louie.decarlo@mci.com

lrice@psrec.coop
LRLEYVAMO@BESTEL.COM.MX
lr Rogers@Premysis.com
lroller@ponderosatel.com
ltillery@sbrda.org
lvalmana@yakamerica.com
lvinas@twncorp.com
lwhite@championbroadband.com
lynnf@stcg.net
m.h.pokorny@ildmail.com
m.haley2@verizon.net
m.pokorny@ildmail.com
mad@dcnwireless.com
maflynna@ibasis.net
magli@comtech21.com
mairac@pcs1.net
malciati@inteltrace.com
malvarado@eblctelecom.com
manager@mcn.org
manzalone@touchtone.net
Marc.Blumer@qwest.com
marc@ttcmail.com
marcel@turn.org
marcelok@telecomusa.com
Marcie.Evans@cox.com
marg@tobiaslo.com
Margaret.O'Connel-Pike@viasat.com
margo.ormiston@verizon.com
maria@vezatelecom.com
mariana.gateway@telcentris.com
marianne@worldnet1.net
Marilyn.Shandolow@intelliverse.com
mark.goldsmith@troutmansanders.com
mark.layton@crossroads.us
mark@access-intl.com
mark@csilongwood.com
mark@kvwireless.com
mark@surfnetc.com
mark@surfnetcusa.com
markc@morenotrenching.com
markn@tpactel.com
markn@transpacgroup.net
markvanness@gmail.com

marsha.pokorny@ildmail.com
martha@IEBroadband.com
martha@mvrconsulting.com
martin@belairinternet.com
marva.johnson@mybighthouse.com
mary.buley@onvoy.com
maryannmitchell@valornet.com
matt@calpop.com
matt@rnkcom.com
mattdavis@freecomusa.com
matthew.ford@usamobility.com
max.kipfer@discoverybeyond.com
mbarnett@telecare.net
mbatdorf@evolveip.net
mberg@vodanetworks.net
mbernal@quasarinc.net
mbp@cpuc.ca.gov
mca@cpuc.ca.gov
mccallister@thecinemanet.com
mcegelski@firstcomm.com
mchawk@ecr.net
mcnicholls@me.com
mcollinsking@csufresno.edu
MCONNOLLY@YOURTEL.COM
md@sandiegobusiness.org
mdozier@csufresno.edu
mdurkin@rawbw.com
melissalawson@dwt.com
mgallagher@pccwglobal.com
mgrillos@sagetelecom.net
mgross@xchangetele.com
mhaverkate@championbroadband.com
mhayes@alec.net
mhayes@singlepipe.net
mhonor@relianceglobalcom.com
mhring@cavtel.com
mhughes@antelecom.net
michael.foreman@att.com
michael.geoffroy@telrite.com
michael.minkus@cpuc.ca.gov
michael.zarrilli@Suddenlink.com
michael@broadbandassoc.com
michael@cticorrections.com

michael@x2telecom.com
Michele.King@cpuc.ca.gov
michele@american-telesis.net
michele_smith@intella2.com
mike.smith@qwest.com
mike@ducortelco.com
mike@navtel.com
mike@ruralbroadbandnow.com
mike@willitsonline.com
Mike-cpuc@tiedyenetworks.com
mikehansen@alarmlink.com
mikek@newpathnetworks.net
miket@itltd.net
mindy@cot.net
mki@cpuc.ca.gov
mkrybus@dynalinktel.com
mlevine@transbeam.com
mlitten@4dct.com
mlp7595@aol.com
mlsmulders@ipnetworksinc.com
mmattes@nossaman.com
mmeier@guacamolepress.com
mmo@cpuc.ca.gov
monikab@stcg.net
monique.crawford@twcable.com
morozco@riverside.ca.gov
mort@praxisfiber.com
motte@bigrivertelephone.com
mpiasecki@catalinabb.com
mpimentel@ci.watsonville.ca.us
mpowers@egreenfield.com
mrichardson@us-south.net
mschreiber@cwclaw.com
mshames@ucan.org
mslawson@bluejaywireless.com
mtanner@nts.net
mtr@commlawgroup.com
mtr@compliancegroup.com
mwidbin@reunioncommunications.com
myra@ats-firstcall.com
myron305@TRITelcom.com
mzayas@callone.com
nand@barevox.com

natalieverette@telequality.com
nathan.glazier@alltel.com
nb2@cpuc.ca.gov
nbell1000@aol.com
nbledsoe@x5solutions.com
NEAL@TELUNITED.COM
neteng@boingo.com
ngreenberg@mono.ca.gov
nicholas.aldi@telispire.com
nicolas@catelecard.com
nicolas@ecvoice.com
nicolasandreasson@euroconnectonline.com
nirupampal@gmail.com
nlubamersky@telepacific.com
noc@grasshopper.com
noc@kern.com
nowona@hns.com
npatrick@corp.sonic.net
nyoung@helio.com
oclip@live.com
ofer@valleyinternet.net
office@goskywest.com
office@telcotel.com
opeggy@cruzio.com
operalta@telemexintl.com
osbill@centrisinfo.com
oscar@alturaintl.com
owen.rochte@cpuc.ca.gov
pamela.trickel@tdstelecom.com
patriciarobbins@dwt.com
patrick@nationwideregulatorycompliance.com
Paul.Cain@cox.com
paul.mcaleese@iwirelesshome.com
paul.sieracki@surewest.net
paul@dacinfo.com
Paul@race.com
paulv@rma-hoa.org
paulw@sdwireless.com
paylesscellular@earthlink.net
pbradshaw@sunesys.com
pchevalier@zayo.com
pclark@paxio.com
pcusack@voxbeam.com

pete@hispanicd.com
peter.hayes@att.com
Peter.Rasmusson@FARRtechnologies.com
peter.russo@ymaxcorp.com
peter.wilkins@verizonwireless.com
peter@commnexus.com
peter@freeway.com
peter@snowcrest.net
phil@sat2u.com
PHILILLINI@aol.com
phyllis@kgslawyers.com
pioneertelecom@msn.com
pkirby@scitel.net
pkranz@unwiredltd.com
pl@cableview.tv
Planning@Winters-Broadband.com
pls@unwiredbb.coM
plumasco@psln.com
pmasters@ernestgroup.com
pod@cpuc.ca.gov
ppieters@newedgenetworks.com
preferred@aol.com
prosvall@cwclaw.com
prregulatory@comcast.net
psheth@aptela.com
psp@cpuc.ca.gov
pstazzone@aldtelecom.com
puc@cimco.net
puc@ValleyInternet.net
r.engehausen@gmail.com
r.fasi@darcommunications.com
r.fowler@digitalputty.com
rachelechong@gmail.com
ralphc@nbsvoice.com
Ramiz.Rafeedie@att.com
ramona.totten@cnxntech.com
rand@telequality.com
randolph@lonepinetv.com
randy@sedcorp.biz
randy@wildirismedical.com
randylowe@dwt.com
raquel.cinat@cetfund.org
raudino@csufresno.edu

raul@corp.race.com
raul@logical.com.mx
Ravneet.Kaur@cpuc.ca.gov
raymond@gctcorp.com
rbrent@garlic.com
rcampbell@razzolink.com
rchoinski@lighttower.com
rcocklin@rockgrp.com
rcosta@turn.org
rdepalma@nexustel.net
RDICHY@METTEL.NET
rdj@att.com
rebecca.turner@cpuc.ca.gov
reg.compliance@nobelusa.com
regan.rishel@stratosglobal.com
RegMgr@stcg.net
regtss@att.com
regulations@allcompass.com
regulatory.compliants@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@wcs.com
regulatory@widevoice.com
regulatoryaffairs@accesspointinc.com
regulatoryaffairs@anpolutions.com
regulatoryaffairs@cavtel.com
regulatoryaffairs@zonetelecom.com
regulatorytax@8x8.com
revlyn.williams@gmail.com
rex.knowles@xo.com
rfasnacht@wecare.net
rfranz@telelight.com

rgrason@nitelusa.com
rhh@cpuc.ca.gov
rich@rnkcom.com
richard@tremcom.com
rick@cre-powerpage.com
rick@downnetworks.com
rickm@volcanotel.com
rj2397@att.com
RKooistra@corp.earthlink.com
rkunze@colusanet.com
rl@acinetcom.com
rluces@admatel-usa.com
rmahfouz@msmcpa.com
Rmitchell@unwiredltd.com
rmocas@eastontelecom.com
rmonto@neutraltandem.com
rnichols@mmgholdings.net
rnorton@tminc.com
robert.swayze@laedc.org
robert@corp.succeed.net
robert@rhinobee.com
rodney@ctlcorp.net
ron@ewcommunications.net
ronw@teledynamic.com
roz.stauthamer@viasat.com
rperea@nos.com
rquinto@golegacy.com
rriberal@owtel.com
RRichardson@MomentumTelecom.com
rrife@diversifiedconsulting.net
rsalzman@tracfone.com
rsanchez@bluecasa.com
rsheehan@nhcgrp.com
rt@kddia.com
rtbenne@earthlink.net
rudymreyes@verizon.com
ruellm@luckycomm.net
russ@sedcorp.biz
russem@semperon.com
rvolker@inyonetworks.com
rvolker@praxisfiber.com
rw1@cpuc.ca.gov
rwh@cpuc.ca.gov

ryan@excitetelecom.com
ryan@fireserve.net
rynae.benson@verizonwireless.com
s.zolfonoon@planetetelesis.com
sagonzales@csufresno.edu
sales@aerosurf.net
sales@rockyridge.us
sales@skyq.com
samuel.sheagren@viasat.com
sandi.romena@gmail.com
sandrawilliams@netoneint.com
sandy@sedcorp.biz
sarapw@ftcpa.net
sbogdan@broadviewnet.com
scannon@quick-tel.com
schat@schat.net
schwenkl@gic.csuchico.edu
scott.ringo@cinbell.com
scott@myrep.net
SDabbs@CSUFresno.edu
sdavis@voyss.com
sdize@ovctelecom.com
sean@accesshumboldt.net
SEDWARDS@cde.ca.gov
selbytelecom@gmail.com
seth@101netlink.com
sfenker@earthlink.net
sfenker1@earthlink.net
sfetzer@cctonline.net
sflessner@wjcable.net
sfrisch@sierrabusiness.org
shala@goldline.net
shance@atcaa.org
shannon.wagner@deltacom.com
sharon.e.adams@xo.com
sharon.watkins@mclmlc.com
ShawnBarker@ShawnBarkerConstruction.com
sheaton@rcrcnet.org
sherri.wheatley@speakerbus.com
sherri@broadcore.com
shobbs@megapath.com
showsare@firstchoicetele.com
shurlbert@shafter.com

silvcomm@yahoo.com
SIM@cpuc.ca.gov
SimonKim@KTAmerica.com
simsph@dpiteleconnect.com
sirusz@planetonline.com
sjoachim@redwoodtelephone.com
skellogg@neutraltandem.com
skraut@metropcs.com
slarson@linchousing.org
smalllecs@cwclaw.com
smartriverside@riversideca.gov
smartvoicenetwork@gmail.com
smdaniel@horizoncable.com
smdaniel@horizoncable.net
smendez@mcgrawcom.net
sntaylor@cot.net
spappalardo@renegadetech.com
SPark@ITSCommunications.com
sperrotte@800response.com
srbryanjr@pintelco.com
srt@cpuc.ca.gov
SSanta@covad.com
sschifando@digitalpath.net
ssearle@ekit-inc.com
ssinclair@airdis.com
sstricker@tspan.net
sstudebaker@dtslfca.com
stacie.castro@cpuc.ca.gov
stacie.nothem@humboldt.edu
stephan.shin@cosmobridge.co.jp
Stephanie.Cassioppi@uscellular.com
stephanie.jackson@ncic.com
stephen.h.kukta@sprint.com
Steve.sharpe@sonoma-county.org
steve.south@vocalocity.com
steve@avispmail.com
steve@cds1.net
steve@frontiergeotek.com
steve@thinkingphones.com
steve@wilson-creek.net
steveblum@tellusventure.com
steven.au@newworldtel.com
Steven.karp@humboldt.edu

STEVIN@COMITYCOMMUNICATIONS.COM
stthomas@tminc.com
sue@warp2biz.com
supers@touch-tel.com
support@airenetworks.com
support@ap.net
support@bjt.net
support@calweb.com
support@colfaxnet.com
support@ewnet.net
support@goldstate.net
support@got.net
support@keyway.net
support@snowcrest.net
support@tcsn.net
support@willitsonline.com
susan.lipper@t-mobile.com
suzannetoller@dwt.com
swilson@voyss.com
swindsor@tsra.org
swong@globalcomcorp.com
tajit.mehta@clearwire.com
takis@nettalk.com
tara.jackson@birch.com
tara.thronson@valleyvision.org
taxelton@c1-slo.com
tbiddix@telecomgroup.com
tch@cpuc.ca.gov
tdelgado@lccomminc.com
teana@gtfredeen.com
tech@mlode.com
telewest@vail.net
tf@velotech.net
tgc@cpuc.ca.gov
tgcvc@sbcglobal.net
tgentry@zayo.com
tgoren@g2sol.net
thecardroominc@aol.com
theradioshop@jimsradioshop.com
thomas.haluskey@ecntel.com
thomas.k.braun@sce.com
thomas.selhorst@att.com
tim@digitalwest.net

tim@telequality.com
tim@vidafon.com
timj@ponderosatel.com
tina.colvin@quest.com
tina.manning@centurytel.com
tina@x2comm.com
tjg@cpuc.ca.gov
tkeane@lebbsi.com
tkimura@nobelglobe.com
tkirby@tminc.com
tlynch@telecomlawyers.com
tmelgaard@wavebroadband.com
todd@nationalcomtel.com
todd@nccom.com
todd_west@inter-tel.com
todds3@cox.net
tolson@oacys.com
tom.bardo@nelsonmullins.com
tom@uatnow.com
tom@viscominternational.com
tom@westfamily.org
tom@zeustele.com
tomie_Nelson@adp.com
tommcveigh@yahoo.com
tomspeed@nationalda.com
tony.tully@cpuc.ca.gov
tony@razzolink.com
tonya@siskiyoucounty.org
traci.romedy@cw.com
tracy@mixnetworks.com
travis@tctelephone.net
tray@extenetsystems.com
trevor@RoycroftConsulting.org
trisa.struckman@satventuresmanagement.com
tsanders@icoe.org
tsungi.ludy@lightyear.net
tswift@ustelestar.com

tff@cpuc.ca.gov
tvaitkus@infohighway.com
twalsh@oneabinetwork.com
twc.regulatory.complaints@twcable.com
tweiksnaar@bullseyetelecom.com
Tym.Rutkowski@mossadams.com
unitedtelecomca@yahoo.com
vanessa.leon@spectrotel.com
veronica@nordisksystems.com
vgarcia@cabrilloedc.org
vic@interconnections-services.com
vicent.petrescu@necc.us
victor@bktgroup.com
vspehar@fidelityvoice.com
vtownsend@paytel.com
wac@cpuc.ca.gov
waihun@cot.net
wayne@2talk.com
wayne_foster@mitel.com
wes@uia.net
wg1@cpuc.ca.gov
wgandy@ecllc.com
whaas@mcleodusa.com
william.adler@globalstar.com
william.c.prentice@gmail.com
william.kuchler@verizonwireless.com
william.sanders@sfgov.org
wirawan.krisman@team.telstra.com
woolfson@telswitch.com
wsatterb@csufresno.edu
wscheppy@above.net
XiaoSelena.Huang@cpuc.ca.gov
XLeonard@gmail.com
xsh@cpuc.ca.gov
ysmythe@caltel.com
zebzankel@dwt.com