



FILED
01/06/20
04:59 PM

EXHIBIT 9

Peter M. Hayes
Assistant Vice President
Regulatory Affairs

AT&T Services, Inc.
430 Flush Street, 5th Floor
San Francisco, CA 94108-3735

I 415.417.5017
ni 415-601-3655
peter.hayes@att.com
att.com

November 5, 2019

Cynthia Walker
Director – Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Via email to: cynthia.walker@cpuc.ca.gov

RE: NG911 Services

Dear Ms. Walker:

We have received your letters from April, June, and September 2019 stating CPUC Staffs position that AT&T California (and affiliates where appropriate) must update tariffs as the State of California Office of Emergency Services (CalOES) transitions to NG911 technology.

Your April 26 letter states that AT&T California is "required to file tariffs for 9-1-1 services available within your territory" (and also in CLEC territory where appropriate), and provides an illustrative list of NG911 Trunk Services at various speed levels and for various purposes. AT&T California does not offer a NG911 Trunk Services in California, and therefore does not have a NG911 Trunk Service to tariff at this time.

Your September 18 letter requires that AT&T tariff the 911 service provided to CalOES, commonly referred to as "Pasadena RING." AT&T Corp., a CLEC affiliate of AT&T California, provides this service under a contract entered into in January 2017. This contract is set to expire on January 20, 2020 (with four available one-year extensions). This specific custom, integrated, and managed arrangement, with terms, pricing, and service levels negotiated and agreed to between CalOES and AT&T Corp., is not a generally-available service appropriate for placement in a tariff. However, in an effort to address your concerns, AT&T Corp. created a new tariff for Customer Specific Contracts, and provided a copy of the contract to the CPUC on October 4, 2019. This tariff filing was rejected by CPUC Staff on October 23.¹ The contract is still valid, however, and AT&T will continue to perform under

¹ General Order 96-B, General Rule 7.6.1 allows staff to reject an Advice Letter if it is "clearly erroneous, including without limitation where there are clear inconsistencies with statute or Commission order"; Staff's rejection is not consistent with this rule.

AT&T

this arrangement through January 20, 2020, and further if extended under the contract's terms by CalOES.

Other than the specific instance of the Pasadena RING, AT&T Corp. does not offer or provide NG911 call routing services in California, and therefore does not have any other services to tariff.

Under Federal law,² AT&T is required to transmit 911 calls to PSAPs or other designated emergency locations. Now that CalOES has selected new vendors to transition from existing E911 providers (including AT&T) to NG911 services in the future, AT&T will work with the selected vendors to deliver AT&T's own end-user 911 traffic to them.

Given that there appears to be some misunderstanding on the role of AT&T California and AT&T Corp. in the transition to NG911, we believe a meeting with you, CalOES, and AT&T would be productive.

Sincerely,



² See C.F.R. Section 64.3001 "All telecommunications carriers shall transmit all 911 calls to a PSAP, to a designated statewide default answering point, or to an appropriate local emergency authority as set forth in §64.3002".

EXHIBIT 10

From: "Walker, Cynthia" <cynthia.walker@cpuc.ca.gov>
Date: November 14, 2019 at 3:24:13 PM MST
To: "HAYES, PETER M" <ph3693@att.com>
Subject: RE: NG911 Services

Peter,

Thank you for the letter and my apologies for the delay getting back to you. The letter explains AT&T's position and I do not see a need to meet with AT&T and CalOES at this time.

Cynthia Walker
Director
Communications Division
California Public Utilities Commission
cynthia.walker@cpuc.ca.gov
415.703.1836
415.806.0488 (cell)
www.cbuc.ca.gov

Notice: This communication may contain confidential and/or legally privileged information for the use of the intended recipient(s). Unauthorized use or disclosure is prohibited. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

From: HAYES, PETER M <ph3693@att.com>
Sent: Tuesday, November 05, 2019 11:13 AM
To: Walker, Cynthia <cynthia.walker@cpuc.ca.gov>
Subject: NG911 Services

Hello Cynthia,

Attached is a letter from AT&T regarding NG911 services,

Sincerely,

Pete

Peter Hayes
AT&T Services
Assistant Vice President — Regulatory Affairs
Office: (415) 417-5017
Cell: (415) 601-0E155

EXHIBIT 11



9260 E. Stockton Blvd.
Elk Grove, CA 95624

December 11, 2019

Advice Letter No. 12824
Frontier California Inc. (Frontier) (U-1 002-C)

Public Utilities Commission State of California

Subject: Next Generation 9-1-1 Trunk Service

Purpose

Frontier California Inc. (Frontier) hereby submits for **filing** the following changes in its tariff schedules, which are attached hereto:

Cal P.U.C. Sheet No.	Title	Canceling Cal P.U.C. Sheet No.
1st Revised Check Sheet A 1st Revised Sheet 20	Schedule No. A-5	Original Check Sheet A Original Sheet 20

The purpose of this Tier 1 Advice Letter filing is to comply with a CPUC Communications Division letter to Frontier dated April 15, 2019, subsequently updated April 26, 2019, Subject: Filing of updated Tariffs for 9-1-1 Service. The letter advises Frontier that the State of California Office of Emergency Services is updating the 9-1-1 service infrastructure in California with Next Generation 9-1-1 ("NG9-1-1") technology and requires Frontier, as a carrier of last resort, to update its 9-1-1 tariff to include the offering of Trunk Service for NG9-1-1. In compliance with the above, Frontier is making this filing to include Trunk Service in its 9-1-1 tariff for NG9-1-1 and makes this service available to the Regional Network Service Provider (RNSP) Contractor through an Individual Case Basis (ICB) commercial agreement **or Interconnection Agreement**.

This filing will not change any rate or charge, cause the withdrawal of service, nor conflict with other schedules or rules.

Protests

Anyone may object to this advice letter by sending a written letter or E-mail no later than 20 days from the date of this filing. Protests must be submitted to:

Telecommunications Advice Letter Coordinator
Communications Division
505 Van Ness Ave., 3rd floor
San Francisco, CA 94102-3298
TD.PAL@cpuc.ca.gov



California Public Utilities Commission
December 11, 2019
Page 2

The protest shall also be sent to Frontier either via E-Mail or at the address shown below on the same date as mailed or delivered to the Commission:

Charles E. Born
Director, Government & External Affairs
Frontier Communications
9260 E. Stockton Blvd.
Elk Grove, CA 95624
[Charlie.Born](mailto:Charlie.Born@ftroorn) ftroorn

Effective Date

Frontier requests that this Tier 1 Advice Letter become effective on December 12, 2019, which is one calendar day after the date of filing in accordance with General Order 96-B, Telecommunications Industry Rule 7.1.

Notice

In accordance with General Order 96-B, Section 4.3, copies of this Advice Letter are being served electronically to parties shown on the attached list and to those interested parties requesting such notification. In addition, Frontier is sending an email copy of this advice letter to the Commission-Maintained Service List.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Charles E. Born", followed by a horizontal line.

Charles E. Born
Director, Government & External Affairs

cc. Frontier Advice Letter Service List

CEB: tmr
Attachments

Frontier California Inc. (Frontier) Advice Letter Service List

Via E-Mail

CPUC
lehPcpuc.ca.gov

CPUC ORA
chris.uncsonAcpuc.ca.gov

AT&T
regtsseatt.com

Consolidated Communications
regulatorvesurewest.com

State 9-1-1 Program
Monica.McGrath@state.ca.gov

Commission-Maintained Service list for "Changes in rates, terms and conditions of service, or initiation of new service" found at <https://iacouc.ca.gov/alsl.exportlist.aspx?listid=1>

941 EMERGENCY TELEPHONE SERVICE

LIST OF EFFECTIVE SHEETS

Revision Number	Sheet	Revision Number	Sheet
1st Revisecr	CS A		
Original	TOC 1		
Original	1		
Original	2		
Original	3		
Original	4		
Original	5		
Original	6		
Original	7		
Original	8		
Original	9		
Original	10		
Original	11		
Original	12		
Original	13		
Original	14		
Original	15		
Original	16		
Original	17		
Original	18		
Original	19		
1 st Revisecr	20		
Original	21		
Original	22		
Original	23		
Original	24		
Original	25		
Original	26		
Original	27		

Dencites Change

Advice Leiter No. 12824

Issued By
 Senior Vice President
 Regulatory Affairs

Date Filed: 12/11/19
 Effective: 12/12/19
 Resolution No.

Decision No.

9-1-1 EMERGENCY TELEPHONE SERVICE

VIII. 9-1-1 WIRELINE AND WIRELESS RATE ELEMENTS (Continued)

A. DSO, 2- or 4-Wire Analog Trunk/Circuit:

(1) Central Office to 9-1-1 Selective Router or Direct to PSAP (No Selective Router Involved) 9-1-1, per trunk

Includes a 2- wire or 4-wire voice grade circuit from a Utility central office switch to a Utility Selective Router or to a PSAP.

Provides AN I using CAMA or SS7 format.

For circuits requiring multiple carriers, the Utility will use Meet Point Billing for its portion of the circuit.

Requires dedicated trunks to meet P.01 grade of service from each end office regardless of host or remote arrangement.

(2) Private Switch to 9-1-1 Selective Router, per trunk

Includes a 2-wire or 4-wire voice grade circuit from a Private Switch to a Utility Selective Router.

Provides ANI using CAMA format.

Requires dedicated trunks to meet P.01 grade of service.

(3) Selective Router to PSAP, per trunk

Includes a 2-wire or 4-wire voice grade circuit from a Utility Selective Router to a PSAP.

Provides AN1 using CAMA or EMF format.

For circuits requiring multiple carriers, the Utility will use Meet Point Billing for its portion of the circuit.

Requires dedicated 9-1-1 trunks to meet P.01 grade of service from the Utility Selective Router to the PSAP.

Provides a 2-wire voice grade Alternate Routing Channel from the PSAP to the Selective Router. Does not include the customer provided key equipment needed at the PSAP location to activate Alternate Routing.

(4) Selective Router to Selective Router Trunks, DSO or DS1

Includes connection between routers to allow for PSAP transfers, and selective routing between 9-1-1 Selective Routers.

For circuits requiring multiple carriers, the Utility will use Meet Point Billing for its portion of the circuit.

(5) Next Generation 9-1-1 (NG9-1-1) TDM Trunk Service

NG9-1-1 Time Division Multiplexing (TDM) Trunk Service will be provided to the Regional Network Provider (RNSP) Contractor based on terms and pricing defined by an Individual Case Basis (ICB) commercial agreement or Interconnection Agreement.

As set out the Company's (Utility's) PS/ALI Service, Schedule No. A-7, Section I, the PS/ALI Service Customer may purchase E9-1-1 Trunk services from this E9-1-1 Service Tariff for use with the Company's PS/ALI Service only.

EXHIBIT 12



Consolidated'

C o M m u n i c a t i o n s

PO Box 619969, Roseville, CA 95661-0969

www.consolidated.com

August 20, 2019

Via Overnight Mail

Consolidated Communications of California Company U-1015-C

Advice Letter 2067

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Consolidated Communications of California Company ("Consolidated") hereby transmits for filing this Tier 1 advice letter pursuant to the provisions of General Order 96-B for changes to the following tariff schedule sheets:

SCHEDULE CAL. P.U.C. NO. 1-L, TELEPHONE SERVICE

11th Revised Check Sheet A 10th Revised Check Sheet C 1st Revised Sheet 210

This filing is made to comply with a CPUC Communications Division letter to Consolidated dated April 15, 2019, subsequently updated April 26, 2019, Subject: Filing of updated Tariffs for 9-1-1 Service, The letter advises Consolidated that the State of California Office of Emergency Services is updating the 9-1-1 service infrastructure in California with Next Generation 9-1-1 ("NG9-1-1") technology and requires Consolidated, as a carrier of last resort, to update its 9-1-1 tariff to include the offering of NG9-1-1 Trunk Service. In compliance with the above, Consolidated is making this filing to include NG9-1-1 Trunk Service in its 9-1-1 tariff and makes this service available to the Regional Network Service Provider (RNSP) Contractor through an Individual Case Basis (ICB) commercial agreement.

In compliance with General Order 96-B, we are serving a copy of this advice letter and related attachments to competing and adjacent Utilities and/or other Utilities, and interested parties, as requested. If there are any questions regarding this advice letter, or its distribution, please call (916) 786-1597, or email floyd.jasinski@consolidated.com.

Anyone may object to this advice Letter, which was filed August 21, 2019, by sending a written protest to: Telecommunications Advice Letter Coordinator, Communications Division, 505 Van Ness Ave., 3rd Floor, San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to Floyd Jasinski, 211 Lincoln St., Roseville, CA 95678 (fax number 916-786-1877). If this advice letter was served via e-mail, the protest must be served to Consolidated via e-mail at floyd.jasinski@consolidated.com. To obtain information about the Commission's procedures for advice letters and protest, go to the Commission's Internet site (www.cpuc.ca.gov) and look for document links to General Order 96-B.

We request the tariff sheets submitted herein under Tier 1 treatment become Effective August 22, 2019.

Sincerely,

/s/ Floyd Jasinski
Floyd Jasinski
Manager, Government Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION Advice Letter Filing Summary Sheet (PAL)		(Date Filed /Received Stamp by CPUC Industry Division)	
		Date AL served on parties: 8/21/2019	
Company Name: Consolidated Communications of California Company		CPUC Utility Number U-1015-C	
Address: P. O. Box 619969		OGRC-LEC EURF-Carrier 00ther	
City, State, ZIP: Roseville, CA 95661-0969		Commission Resolution Requested /..Carrier of Last Resort (See D.96-10-066)	
Filing AL #: 2067 Requested Effective Date: 08/22/2019		AL Tier I El ri m M	
Name:		Email Address:	
Phone No.:		Fax No.:	
A	Floyd Jasinski	floydjasinski@consolidated.com	916-786-1597
15	Carole Williamson	carole.williamson@consolidated.com	207-797-1190
- No. Tariff Sheets: -3-			
(Name, email address & Phone and FAX numbers are Required for "Filer")			
Tariff Schedules: P.U.C. No. 1-L		Keyword: Service Changes <small>(see keyword list on reverse)</small>	
For Contract Keyword Type: Government El Other Data Executed		Contract Total Rev (5)	
Subject of Filing: Next Generation 9-1-1 Trunk Service			
<small>(Service(s) included)</small>			
Authorization for filing: D.07-01-024,D.07-09-019			
<small>(Resolution ii, Trecision II, etc.)*</small>			
Affected services: "			
<small>(Other services affected, pending or replacement AL filings)</small>			
Rate Element(s) affected and % change:			
<small>(Non-recurring and for recurring)</small>			
Customer Notice Required (if so, please attach)			
Notes/Comments:			
(Other information & reference to advice letter, etc.):			
File Protest and/or Correspondence to:		GRC-LEC = Cost of Service LEC Carrier URF-Carrier = Uniform Regulatory Framework Carrier <small>(see D.06-08-030/D.07-09-019)</small> OTHER= Wireless (CMRS) Carrier	
Director, Communications Division 505 Van Ness Ave., San Francisco, CA 94102 and if you have email capability, ALSO email to:			
TD_PAL@cpuc.ca.gov			
Protest also must be served on utility: <small>(see utility advice letter for more information)</small>			
El Resolution Required		Supv. / Analyst	
Executive Action Resolution Req'd.		/	
TD Suspension on: / /		Due Date to Supv.:	
El Comm. Suspension on: / /		Analyst Completion Date:	
Resolution No.: T -		Supervisor Approval Date:	
Rev. 09/24/07		AL / Tariff Effective Date:	
		Notes:	

LIST OF EFFECTIVE SHEETS

Sheets listed below are effective as of the date shown on each sheet.

Sheet	Revision Number	Sheet	Revision Number	Sheet	Revision Number
Title	Original	30	Original	60	Original
CS A*	11th	31	Original	61	Original
CS B	1st	32	Original	62	Original
CS C*	10th	33	Original	63	Original
1	Original	34	Original	64	Original
2	Original	35	Original	65	Original
3	Original	36	Original	66	Original
4	Original	37	Original	67	Original
5	Original	38	Original	68	Original
6	Original	39	Original	69	Original
7	Original	40	Original	70	Original
8	Original	41	Original	71	Original
9	Original	42	Original	72	Original
10	3rd	43	Original	73	Original
11	Original	44	Original	74	Original
12	Original	45	Original	75	Original
13	Original	46	Original	76	Original
14	Original	47	Original	77	Original
15	Original	48	Original	78	Original
16	Original	49	Original	79	Original
17	Original	50	Original	80	Original
18	Original	51	Original	81	Original
19	Original	52	Original	82	Original
20	Original	53	Original	83	Original
21	Original	54	Original	84	Original
22	Original	55	Original	85	Original
23	Original	56	Original	86	Original
24	Original	57	Original	87	Original
25	Original	58	1st	88	Original
26	Original	59	1st	89	Original
27	Original				
28	Original				
29	Original				

* Denotes new or revised

Issued By _____ Date Filed AUG 21 2019

Advice Letter No. 2067 _____ Vice President _____ Effective AUG 22 2019

Decision No. _____ Regulatory & Public Policy Resolution No. _____

LIST OF EFFECTIVE SHEETS — (Coned)

Sheets listed below are effective as of the date shown on each sheet

<u>Sheet</u>	<u>Revision Number</u>	<u>Sheet</u>	<u>Revision Number</u>	<u>Sheet</u>	<u>Revision Number</u>
181	Original	216	Original	250	Original
182	Original	217	Original	251	Original
183	Original	218	Original	252	Original
184	Original	219	Original	253	Original
185	Original	220	Original	254	1st
186	Original	221	Original	255	3rd
187	Original	222	Original	255.1	1st
188	Original	223	Original	255.2	1st
189	Original	224	Original	256	Original
190	Original	225	Original	257	Original
191	Original	226	Original	258	1st
192	Original	227	Original	259	1st
193	Original	228	Original	260	1st
194	Original	229	Original	260.1	1st
195	Original	230	Original	260.2	1st
196	Original	231	Original	260.3	1st
197	Original	232	Original	260.4	1st
198	Original	233	Original	260.5	Original
199	Original	234	Original	260.5.1	Original
200	Original	235	Original	260.5.2	Original
201	Original	236	Original	260.6	1st
202	Original	237	Original	260.7	Original
203	Original	238	Original	260.8	Original
204	Original	239	Original	260.9	Original
205	Original	240	Original	260.10	1st
206	Original	241	Original	260.11	4th
207	Original	242	Original	260.12	1st
208	Original	243	Original	261	Original
209	Original	244	Original	262	Original
210*	1st	245	3rd	263	Original
211	Original	246	3rd	264	Original
212	Original	247	3rd	265	Original
213	Original	247.1	2nd		
214	Original	248	Original		
215	Original	249	Original		

* Denotes new or revised

	<u>Issued By</u>	Date Filed <u>AUG 21 2019</u>
Advice Letter No. <u>2067</u>	<u>Vice President,</u>	Effective <u>AUG 22 2019</u>
Decision No. _____	<u>Regulatory & Public Policy</u>	Resolution No. _____

4. EMERGENCY REPORTING SERVICE — (Cont'd)

4.1 ENHANCED 9-1-1 (E9-1-1) (Cont'd)

4.1.3 RATES AND CHARGES (Cont'd)

(B) SERVICE ARRANGEMENTS

Monthly Rate

9-1-1 DMS Database updates
- per 1,000 lines served' \$11.84

(C) NETWORK COMPONENTS

Non-recurring Charges Installation Charge Monthly Rate

(1) E9-1-1 End Office Trunks, PSAP Circuits, ² and Mileage	Will be provided in accordance with Schedule Cal. P.U.C. No. 1, Section 7			
(2) E9-1-1 ALI Data Circuits	Will be provided in accordance with Schedule Cal. P.U.C. No. 1, Section 7			
(3) Next Generation 9-1-1 (NG9-1-1) TDM Trunk Service ³	ICB ³	ICB ³	ICB ³	(N) (N)

The quantity is rounded to the nearest 1,000 lines served by the customer's system. Every month, quantities will be adjusted for purposes of updating the customer's monthly billing.

² The number of circuits required to a PSAP will be determined by the Utility based upon expected call volumes, engineered to P01 grade of service. The customer may subscribe to additional E9-1-1 PSAP circuits.

NG9-1-1 Time Division Multiplexing (TDM) Trunk Service provided to the Regional Network Service Provider (RNSP) Contractor via ICB having terms and pricing defined by a commercial or interconnection agreement. (N)
(N)

(Continued)

<u>Issued By</u>	Date Filed <u>AUG 21 2019</u>
Advice Letter No. <u>2067</u> <u>Vice President,</u>	Effective <u>AUG 22 2019</u>
Decision No. _____ <u>Regulatory & Public Policy</u>	Resolution No. _____

EXHIBIT 13

GAVIN NIMSOIVI
GOVERNOR

•MARK S. CHILAR
DIRECTOR



December 5, 2019

Jonathan Holland
Regional Sales Director, West
AT&T Public Safety Solutions
1452 Edinger Avenue, 2nd Floor
Tustin, CA 92780

SUBJECT: PASADENA RING PROJECT, RFO #R02586-2016, STD 213 AGREEMENT 4165-6

Mr. Holland:

The purpose of this letter is to formally communicate the Governor's Office of Emergency Services' (Cal OES) will not exercise the contract extension options in RFO #R02586-2016. As you may recall on September 11, 2019 during a conference call with the CA 9-1-1 Branch to discuss the status of the Pasadena Ring project and the Evergreen CPE solution. The contract for these services expires on January 16, 2020, as cited in the STD 213, Agreement #4165-6.

Cal OES is requesting that AT&T provide a project plan to decommission the ESInet services and to relocate the Evergreen CPE. This plan shall be delivered to Cal OES no later than December 20, 2019. The plan will be reviewed and approved by the CA 9-1-1 Branch prior to the commencement of any work.

Sincerely,

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Budge Ct sier
Public Safety Communications, 9-1-1 Branch Manager

EMI
Ae redifed..1
... .

601 SEQUOIA PACIFIC BLVD, SACRAMENTO, CA 95811
(916) 657-9494 I (916) 657-9259 FAN
www.CIIIOES.ca.f.tox

EXHIBIT 14

CALIFORNIA PUBLIC UTILITIES COMMISSION Advice Letter Filing Summary Sheet AL	Date Filed / Received Stamp by CPUC Industry Division Date AL served on parties: 10/04/2019
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Company Name: AT&T Corp.		CPUC Utility Number U -5002-C	
Address: 430 Bush Street, 5th Floor		MI GRC-LEC 1>4 URF-Carrier D Other	
City, State, ZIP: San Francisco, CA 94108		III Commission Resolution Requested Carrier of Last Resort (See 0.96-10-066)	
Filing AL #: 4336	Requested Effective Date: 10/04/2019	AL Tier I rj. II Li III ri	
Name:	Email Address:	Phone No.:	Fax No.:
Mark Berry	att-regulatory-ca@att.com	(415) 417-5033	(214) 486-1580
	att-regulatory-ca@att.com	(415) 417-5033	No. Tariff Sheets: 5

(Name, email address & Phone and FAX numbers *are Required for "Filer"*)

Tariff Schedules: K-T Keyword: Compliance - CPUC Letter dated September 18, 2019
 For Contract Keyword, Type: Government Other Date Executed _____ Contract Total Rev (8) _____

Subject of filing: Establish Customer Specific Contracts Tariff
 (Service(s) included)

Authorization for filing: Response to CPUC Letter Dated September 18, 2019
 (Resolution if, Decision II, etc.)

Affected services: _____
 (Other services affected, pending or replacement AL. filings)

Rate Element(s) affected **and** % change: _____
 (Tion-recurring and I or ?warring)

0 Customer Notice Required (if so, please attach)
 NoteN/Connisetsits:
 (Other information & reference to advice letter, etc.)

File Protest and/or Correspondence to:
 Director, Communications Division
 505 Van Ness Ave., San Francisco, CA 94102
and if you have entail capability, ALSO epttait to:
TD_PAL@epue.ca.gov
Protest also nntst be served on utility:
 (see utility advice letter for more information)

GRC-LEC = Cost of Service LEC Carrier
 URF-Carrier = Uniform Regulatory Framework Carrier
 (see D.06-08-030/D.07-09-019)
 OTHER = Wireless (CMRS) Carrier

FOR CPUC USE ONLY

Resolution Required
 Executive Action Resolution Req'd.
 TD Suspension on: /
 Comm. Suspension on: / I

Resolution No.: T - _____

Rev. 09/24/07

Supv. / Analyst _____

Due Date to Supv.: _____

Analyst Completion Date: _____

Supervisor Approval Date: _____

AL / Tariff Effective Date: _____

Notes: _____

AT&T Corp. att-regulatory-caPatt.com
430 Bush Street
5th Floor
San Francisco, CA 94108 www.att.com

October 04, 2019

U 1001 C
Advice Letter No. 4336

Public Utilities Commission of the State of California

We attach for filing this Tier I advice letter to introduce the following tariff sheets:

SCHEDULE CAL.P.U.C. NO. K-T

Title Page Original Sheet 1
Table of Contents " " 1
Preliminary Statement Sheet 1
Section 1 Original Sheet I
Section 2 " " 1

This filing is being made in response to a letter from Cynthia Walker, Director CPUC Communications Division dated September 18, 2019, requesting that AT&T update its tariffs to include the Pasadena RING (Regional Integrated Next Generation) Project (Pasadena RING). In response, this filing establishes Schedule Cal. P.U.C. No. K-T, "Customer Specific Contracts" and provides a copy of the Pasadena RING contract to the CPUC.

As an Information Service and under existing California Public Utilities Code Section 710, it is AT&T's position that this new tariff and the Pasadena RING contract are not required to be filed with the CPUC. By its own terms, the Pasadena RING contract may expire as soon as January 16, 2020, unless renewed by the customer.

In compliance with General Order 96-B, we are serving a copy of this advice letter to interested parties as requested. If there are any questions regarding the distribution of this advice letter, call 415.417,5033.

This filing will not increase any rate or charge, cause the withdrawal of service, nor conflict with other schedules or rules.

Anyone may object to this advice letter, which was filed October 4, 2019, by sending a written protest to: Telecommunications Advice Letter Coordinator, Communications Division, 505 Van Ness Avenue, 3rd Floor, San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to Peter Hayes, 430 Bush Street, 5th Floor, San Francisco, CA 94108 (fax number 214.486.1580). If this advice letter was served via e-mail, the protest must be served to AT&T California via e-mail at att-regulatory-ca@att.com. To obtain information about the Commission's procedures for advice letters and protests, go to the Commission's Internet site (www.cpuc.ca.gov) and look for document links to General Order 96-B.

AT&T

AT&T CORP.

2.

This filing is effective October 4, 2019.

Yours truly,

AT&T Corp.

A handwritten signature in black ink, appearing to read "P Hayes". The signature is written in a cursive style with a large initial "P" and a distinct "Hayes" following.

AVP — AT&T Regulatory

Attachments

AT&T Corp. Advice Letter Service List (Tariffs)

Via e-mail

regtss@att.com
anamaria.johnson@cpuc.ca.gov
anitataffrice@earthlink.net
daniel.ostroff@xo.com
deyoung@caltel.org
tjasinski@surewest.com
info@tobiasto.com
kritter@tminc.com
mmattes@nossaman.com
mschreiber@cwclaw.com
sedwards@bluecasa.com

Commission-Maintained Service List for "Changes in rates, terms and conditions of service, or initiation of new service" found at:

<https://ia.cpuc.ca.gov/ia/iaWexportlist.aspx?listid=1>

.AT&T Corp.
San Francisco, California
U-5002-C

Schedule Cal. P.U.C. No. K-T
Title Page
Original Sheet 1

Customer Specific Contracts

TARIFF SCHEDULE
APPLICABLE TO
CUSTOMER SPECIFIC CONTRACTS
WITHIN
THE STATE OF
CALIFORNIA ISSUED
BY
AT&T CORP.

Advice Letter No. 4336
Decision No.

Issued by
Linda Guay
Tariff Administrator Resolution No.

Date Filed: Oct. 4, 2019
Effective: Oct. 4, 2019

Customer Specific Contracts

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SECTION

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	PRELIMINARY STATEMENT (Explanation of Symbols)
1	GENERAL REGULATIONS
2	LIST OF CONTRACTS

Customer Specific Contracts

PRELIMINARY STATEMENT

Explanation of Symbols

Coding of Tariff Revisions

Revisions to this tariff are coded through the use of symbols. These symbols appear in the right margin of the page. The symbols and their meanings are:

- (C) To signify changed listing, rule, or condition which may affect a rate, charge, term or condition;
- (D) To signify discontinued material, including a listing, rate, charge, rule or condition;
- (L) To signify material relocated to another part of tariff schedules with no change in text;
- (N) To signify new material including a listing, rate, charge, rule or condition; and
- (T)** To signify textual change that does not affect a rate, charge, term, or condition.

Other marginal codes are used to direct the tariff reader to a footnote for specific information. Codes used for this purpose are lower case letters of the alphabet, e.g., x, y and z. These codes may appear beside the page revision number in the page header or in the right margin opposite specific text.

Customer Specific Contracts

SECTION 1 - GENERAL REGULATIONS

1.1 Description

Contracts listed in this tariff and filed with the California public Utilities Commission are customer-specific arrangements for services or facilities at rates, terms, and / or conditions other than rates, terms, and conditions contained in other tariff schedules. These customer-specific arrangements, including availability, pricing, terms, and conditions are pursuant to the availability, pricing, terms, and conditions contained in each specific contract, without reference to or reliance on any other tariff schedule.

. AT&T Corp.
San Francisco, California
0-5002-C

Schedule Cal. P.U.C. No. K-T
Section 2
Original Sheet 1

Customer Specific Contracts

SECTION 2 - LIST OF CONTRACTS

2.1 Pasadena RING (Regional Integrated Next Generation) Project

References:

Agreement Number: 17-4003
Purchasing Authority Number: GOES-0690

Customer: California Governor's Office of
Emergency **Services (Cal OES)**

Contract Expiration Date: January 16, 2020, with extension
options

EXHIBIT 15

Covey, J. Tyson

From: Fischer, Louise E. <Louise.Fischer@cpuc.ca.gov>
Sent: Thursday, October 24, 2019 10:49 AM
To: BERRY, MARK
Subject: Advice Letter 4336 Rejection

Mark,

Please be advised that the CPUC is rejecting AT&T Advice Letter #4336 entitled "Establish Customer Specific Contracts Tariff", dated 10/04/2019. The filing is not in accordance with General Order 96-B, Industry Rules 8.3 for New Service and 8.4 for Changes to Tariffed Rate, Charge, Term or Condition.

In two letters dated April 15, 2019 and June 17, 2019, you were instructed by Cynthia Walker, Director of Communications Division to update your existing 9-1-1 tariffs to accommodate Next Generation 9-1-1 services in your COLR service territories and, if applicable, in your CLEC territories. The letters included a suggested list of Next Generation 9-1-1 service elements with multiple bandwidth options, and directed AT&T to include non-recurring and monthly recurring charges.

In a third letter from the Director of the Communications Division, dated September 18, 2019, Ms, Walker instructed AT&T that all services within its network that carry 9-1-1 traffic must be tariffed (regardless of transport). The tariff shall include non-recurring and monthly recurring charges for all future Next Generation 9-1-1 Emergency IP Network (ESINet) solutions. This letter specifically noted that NG 94-1 services are already deployed in the Los Angeles (Pasadena RING) without a proper tariff on file at the CPUC.

Advice Letter 4336, which AT&T Corporation (CLEC) submitted in connection to the Pasadena RING contract, does not comply with the instructions in the April, June, and September letters, nor is it applicable to AT&T California's AEC service areas. The tariff does not meet the requirements of General Order 96-B, Section 9, "Tariffs," nor is it in accordance with General Order 96-B, Industry Rules 8.3 for New Service and 8.4 for Changes to Tariffed Rate, Charge, Term or Condition. The tariff does not include non-recurring and monthly recurring charges for the Next Generation 9-1-1 Emergency Services IP Network (ESINet) solutions currently deployed in the Los Angeles area. Nor does the tariff include AT&T NG 9-1-1 services to be deployed (by the MEC) throughout the state.

We direct AT&T to re-file this Advice Letter in accordance with General Order 95-B rules and to include a tariff that complies with Next Generation 9-1-1 tariffed service elements.

If you have questions about Advice Letter procedures, please consult the CPUC website at: <http://www.cpucca.gov/General.aspx?id=1012>

-Louise

Louise E. Fischer
Senior Telecommunications Engineer
California Public Utilities Commission
Communications Division
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louise.fischer@cpuc.ca.gov