



iFoster Inc.  
PO Box 159  
Truckee, CA 96160

April 12, 2023

*Via email: CALLADVICELETTER@cpuc.ca.gov*

Mr. Robert Osborn  
Director, Communications Division  
505 Van Ness Avenue, Third Floor  
San Francisco, CA 94102

Re: iFoster Inc. Advice Letter 1-B with Further Budget Clarifications

Dear Mr. Osborn:

Pursuant to Section 7.5.1 of General Order 96-B, iFoster Inc. (“iFoster”) hereby submits this Supplemental Advice Letter No. (“AL”) 1-B. The original iFoster AL 1 was filed on February 13, 2023, with a requested effective date of February 1, 2023. A supplemental iFoster AL 1-A was filed on February 28, 2023. AL 1-A provided further information on the February 2023 through July 2024 (Extension 2) program budget for the California LifeLine Foster Youth Pilot Program, as ordered under Commission Decision (“D.”) 23-01-003, dated January 12, 2023 (“Extension Decision”). Today, iFoster hereby files this second supplemental filing AL 1-B in order to provide additional requested information and clarifications to Communications Division Staff. (See Attachment A) This information supports and justifies portions of the Extension 2 budget due to broadened responsibilities of iFoster under D.23-01-003.

In compliance with G.O. 96-B, we hereby serve a copy of this AL 1-B via email upon the parties identified on the service list for Rulemaking No. 20-02-008 as of March 30, 2023, and the protesting parties.

Anyone may protest or respond to AL 1 which was filed on February 13, 2023, by sending a written protest or response via email to [harjeet.kumar@cpuc.ca.gov](mailto:harjeet.kumar@cpuc.ca.gov) and [maria.valadez@cpuc.ca.gov](mailto:maria.valadez@cpuc.ca.gov) at the Commission’s Communications Division. If submitting a protest, the protest must set forth the specific grounds on which it is based, including supporting information or legal arguments. A protest or response to the advice letter must be submitted to the Communications Division within 20 days of the date the advice letter was filed and served on iFoster Inc. on the same day, at the contact information below.

Notices should be sent to:

Serita Cox  
CEO, iFoster Inc.  
PO Box 159  
Truckee, CA 96160

Via email: [serita@ifoster.org](mailto:serita@ifoster.org)



Rachelle Chong  
Law Office of Rachelle Chong  
345 W. Portal Avenue, Ste. 110  
San Francisco, CA 94127  
[rachelle@chonglaw.net](mailto:rachelle@chonglaw.net)  
Its Outside Counsel

To obtain information about the CPUC's procedures for advice letters and protests, visit the CPUC's website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov) and look for the links to General Order 96-B.

iFoster respectfully requests that the Staff (1) expeditiously grant iFoster AL 1, as supplemented by ALs 1-A and 1-B, as quickly as possible in order for this important program to continue for the Extension 2 period, and (2) provide funding under the prior Extension 1 budget from February 1, 2023, until the effective date of this advice letter once granted, to ensure continuous funding for the program for iFoster and the service provider. With funding no longer available after January 1, 2023, it is imperative that there be continued funding under the prior Extension 1 budget until the grant of this advice letter, for post-January 31, 2023 Program activities by both iFoster and the service provider provided in good faith.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Serita Cox", on a light-colored background.

Serita Cox  
CEO, iFoster Inc.

Attachment: Attachment A

cc: Service list for R.20-02-008  
Chari Worster (via email [chari.worster@cpuc.ca.gov](mailto:chari.worster@cpuc.ca.gov))  
Harjeet Kumar (via email [harjeet.kumar@cpuc.ca.gov](mailto:harjeet.kumar@cpuc.ca.gov))  
Maria Valadez (via email [Maria.valadez@cpuc.ca.gov](mailto:Maria.valadez@cpuc.ca.gov))  
Nicholas Clark (via email [Nicholas.clark@cpuc.ca.gov](mailto:Nicholas.clark@cpuc.ca.gov))



## ATTACHMENT A

iFoster hereby amends its AL 1 and AL 1-A to provide this supplemental information.

### A. Effective Date

iFoster requests that the prior funding approved by T-Mobile AL 28 for the Extension 1 time period (July 15, 2020 to January 31, 2023) be extended until the effective date of this iFoster advice letter, so that there is neither a funding gap nor interruption of service to the participants of the Pilot Program. This is a critical funding issue for iFoster and the service provider.

### B. Marketing and Outreach

iFoster amends its Marketing and Outreach request to be a budget no more than \$6,000 per month for the Extension 2 period (for the time period beginning with effective date of this advice letter through July 31, 2024).

For the Extension 2 time period, iFoster's approach recognizes a shift from 2019 when it initially proposed marketing and outreach primarily via in-person events. iFoster's updated approach for the Extension 2 time period -- based on its three and a half years of experience to date -- will be to use a blended approach of both (1) in-person events with our over 700 agency partners and (2) virtual outreach methods that proved extremely effective during the 2020 – 2023 pandemic era. The virtual outreach methods have proven to be cost effective and efficient, but this approach requires a "virtual call center," virtual workshops, and some personnel to respond to follow-up calls after these virtual events to answer questions and assist interested eligible youth in participating in the pilot program. iFoster requests flexibility in the use of its marketing and outreach dollars to use this blended approach to reach its participant goals. iFoster shall provide a breakdown of its marketing and outreach expenses in a monthly invoice provided to the Commission, and support it with actual invoices for such expenses.

### C. Administration

iFoster requests \$200,000 to perform additional work on its existing CRM system to accurately and efficiently perform the new iFoster reporting functions required by Ordering Paragraph (OP) 3 in D.23-01-003. To provide additional information supporting this request, iFoster explains that it currently has a CRM system that it utilizes for all its foster youth programs, including the CPUC Pilot Program. This is a website developed using Microsoft .NET and related technologies. The iFoster system is built based on a combination of several technologies including Microsoft .NET, C#, HTML 5, JavaScript, JQuery, ASP.NET, Web Services, Web API, and SQL Server. The platform is hosted within Microsoft Azure cloud services which provides security required by Health Insurance Portability and Accountability Act of 1996 (HIPAA) and



compliance with the latest industry standards. There is no hardware associated with its CRM system.

iFoster orders a device from T-Mobile for an eligible foster youth (identified by an iFoster nickname to mask his or her identity due to legal HIPAA requirements that protect the youth's Personal Health Information (PHI) which includes name, social security number, date of birth, address and more)) via Excel spreadsheets that are submitted to T-Mobile's fulfillment shop twice weekly by iFoster. After the device is provisioned, the T-Mobile phone number and SIM are filled in and the Excel spreadsheet returned to iFoster. iFoster then inputs this information into its CRM system, using the iFoster nickname to pair data sets. A monthly detailed activation, termination, usage, and replacements reports will be extracted from T-Mobile billing portal into Excel files for the Extension 2 period, and these reports need to be matched up with the fulfillment information, and the PHI data on each individual participant to ensure accuracy of participant by line and to provide the required CPUC reports.

Based on recent experience, iFoster needs to be able to rapidly identify mismatches of the billed line with the iFoster nickname in the service provider bills, without having to do it manually. iFoster has done it manually once and it was time consuming (two weeks of staff time) and tedious given the volume of participants and state of the data provided by the service provider in its invoices. Having the requested update to the CRM system will allow iFoster to quickly determine the non-matching lines without having to do it manually, a savings of substantial staff time. Given D.23-01-003 requires timely monthly reports, it is important that the CRM be updated to achieve the reporting required in the order.

In order to match the data and produce the required reports, iFoster's CRM system will need to be upgraded to perform the following tasks:

**1- Import data such as the T-Mobile phone number, SIM, replacement of phone information (if any), and usage data from Excel spreadsheets used to order the services from T-Mobile by iFoster.**

- Upload into CRM system based on an iFoster Nickname match
- Add fields in CRM databases to capture the new data (e.g., T-Mobile reported phone #, T-Mobile reported SIM, T-Mobile reported voice, text, data, T-Mobile reported activation date, any phone replacement data)

**2- Build Comparison/Validation Tool and Report**

- Build the analytics to compare each participant match by iFoster Nickname, T-Mobile data and iFoster resident data on specific fields including but not limited to phone number, SIM, activation date, and deactivation date.
- Build an Error Report which documents any and all mis-matches between iFoster data and T-Mobile data by participant, based on iFoster Nickname



- Build export to Excel to transfer data back to T-Mobile for reconciliations

### 3- Build Monthly Reports to Meet D. 23-01-003 Requirements<sup>1</sup>

- Build the analytics to provide the summary reports as required by OP 3 of D.23-01-003 and other key metrics such as participant growth, churn, reason for exit, total phone replacements, participants by age, etc.
- Build the following D. 23-01-003 mandated reports:
  - *Monthly New Applicants*: new applications received by iFoster in reporting month
  - *Monthly New Validated Applicants*: new applicants validated by iFoster in reporting month
  - *Monthly New Orders*: new orders submitted to T-Mobile for fulfillment
  - *Monthly New Participants*: new participants validated by iFoster in reporting month based on T-Mobile source data
  - *Monthly Participant Exits*: participants who have left the program in reporting month and reason
  - *Total Participants*: rolling aggregate of participants validated by iFoster in reporting month based on T-Mobile source data
  - *Monthly Participant Usage*: anonymized participant usage (voice, text, data) validated by iFoster in reporting month based on T-Mobile source data
  - *Monthly Phone Replacements*: new phone replacements validated by iFoster in reporting month based on T-Mobile source data
  - *Phone Replacements by Participant*: rolling aggregate of phone replacements provided to any one participant validated by iFoster in reporting month based on T-Mobile source data
  - *Total Phone Replacements*: rolling aggregate of phone replacements validated by iFoster in reporting month

iFoster requests approval of \$200,000 to augment its CRM Database for tracking and reporting described above. It is anticipated it will take sixty (60) to ninety (90) days to complete the CRM upgrade, and so new reporting will begin after that time period. Communications Division (CD) staff has asked iFoster to comply with the following conditions:

- The Commission will own (1) the source code for the existing iFoster CRM system that was funded by the Commission for the pilot program; and (2) the data relating to the pilot program.
  1. iFoster shall transfer ownership of the source code required for production and any maintenance and operations activities related to the Pilot Program and its data only to

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<sup>1</sup> iFoster will work with CPUC CD Staff on these report designs.



the CPUC. Title to the source code, to the extent that title to the source code is transferable, shall pass to the CPUC. The CPUC shall assign any and all rights necessary to use the source code and data for purposes of iFoster's performance of this pilot program engagement to iFoster. iFoster shall provide system access to CPUC staff to view relevant data pertaining to the iFoster Pilot Program. Viewing of any Personal Health Information (PHI) as defined under HIPAA will be done in a controlled environment as such data may not be transmitted to or stored by a third party, including the CPUC, without appropriate informed consents of either the applicable authority if it is a youth still under care or of the youth if he or she is no longer in care.

2. Lifeline program data created and/or managed during this engagement shall be owned by the CPUC. The CPUC retains sole authority over the creation, modification, and use of Lifeline program data.

- CD Staff requires exports of all data that supports the LifeLine Foster program in a format that allows for import into a normalized Database Management System (DBMS). These exports shall be upon request by CPUC with a frequency of no less than every six (6) months.
- If such data includes PHI as defined under HIPAA, then iFoster may substitute the "iFoster nickname" to shield the identity of the youth.
- Provide vendor or contractor's contract with detailed deliverables and time frame.
  - CD Staff shall be provided with system specifications for the components the CPUC is financing. The CPUC shall be permitted to review the specifications to determine completeness and quality. iFoster shall provide the CPUC with up to three (3) system-generated reports that the CPUC requests. The CPUC shall withhold payment if specifications are insufficient and/or iFoster fails to provide the reports requested within six months of system add-on deployment.
  - iFoster shall provide any and all test results to CPUC staff.
- When invoicing the CPUC for the CRM-related costs, iFoster shall submit an actual invoice from the contractor or vendor with completed deliverables.
- Provide 100% accurate reports within 30 days after the end of each calendar month per D.23-01-003
  - When unable to submit reports on time, inform CD staff of the reasons for the delay with a new target date.
  - Payments to T-Mobile are made only after the services provided are verified through monthly reports.



#### **D. Participant Phone Audit and Fiscal Control**

iFoster amends its request for approval of funding for .25 of its Controller, and the Program Director at .35, to support audit and fiscal control of the pilot program, particularly in light of the increased reporting responsibilities and service provider contract management under D.23-01-003.

#### **E. Phone and Services**

iFoster provides this additional information about the new devices provided free by T-Mobile for each new line as part of its national agreement with iFoster. As noted in iFoster's AL 1-A, the smartphone devices are delivered to participants with a cord but no charging block. In the advice letter, iFoster requested funds for the provision of charging blocks and hard cases for phone protection, which iFoster proposes to bulk purchase.

##### **1. Charging Blocks:**

iFoster proposes to provide charging blocks to participants and have the Pilot Program reimburse the actual monthly cost of the charging blocks provided; in other words, it will not charge the program for all the charging blocks at the time of the bulk purchase, but at the time the charging blocks are sent to participants and only for the number sent out that month.

To further support the charging block request, iFoster provides this data: to date it has ordered 1,314 of new T-Mobile Revvl6 phones for the Extension 2 program. 214 participants have contacted iFoster to say they have no option to purchase, borrow or otherwise power their phones. As a result, iFoster used its emergency funds to purchase wall chargers for these participants. Another additional 572 youth participants have asked to be put on a waitlist for more phone chargers when they become available. In addition, iFoster notes there have been reports of youth participants "burning out" and destroying their phones because they used the wrong charger that was incompatible with the phone or damaged the electric charging socket. This data supports iFoster's plea for funding for the charger blocks on an urgent basis, otherwise the device will become inoperable and defeat the purpose of the Pilot Program.

##### **2. Hard Cases**

iFoster also has requested hard device cases to protect the devices from damage from the youth participants. This is a low cost, prudent investment to help prevent phone breakage by young people. iFoster offers to provide actual data relating to replacement phones requested from the date the Extension 2 program is approved for three (3) months, to demonstrate the need for the hard cases to prevent breakage.

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Service Lists

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**PROCEEDING: R2002008 - CPUC - OIR TO UPDATE**  
**FILER: CPUC**  
**LIST NAME: LIST**  
**LAST CHANGED: APRIL 7, 2023**

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## Parties

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LEON M. BLOOMFIELD  
WILSON & BLOOMFIELD, LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: T-MOBILE WEST LLC DBA T-MOBILE

DISABILITY RIGHTS ADVOCATES  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: DISABILITY RIGHTS ADVOCATES

JAMES DOLGONAS  
PRESIDENT/CEO  
CORPORATION FOR EDUCATION NETWORK  
EMAIL ONLY  
EMAIL ONLY, CA 00000-0000  
FOR: CORPORATION FOR EDUCATION NETWORK  
INITIATIVES IN CALIFORNIA (CENIC)

LEWIS GOLINKER  
ASSISTIVE TECHNOLOGY LAW CENTER  
300 GATEWAY CENTER  
401 EAST STATE STREET, SUITE 300  
ITHACA, NY 14850

MAHEEN COOK  
GENERAL COUNSEL  
NATIONAL LIFELINE ASSOCIATION  
415 MCFARLAN RD., SUITE 108  
KENNETT SQUARE, PA 19348  
FOR: NATIONAL LIFELINE ASSOCIATION  
(NALA)

MICHAEL H. PRYOR  
COUNSEL  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
1155 F STREET NW, SUITE 1200  
WASHINGTON, DC 20004  
FOR: SECURUS TECHNOLOGIES, LLC

WILLIAM D. WALLACE ESQ.  
VERIZON WIRELESS  
1300 I STREET, N.W., SUITE 400 WEST  
WASHINGTON, DC 20005

DANIELLE FRAPPIER  
DAVIS WRIGHT TREMAINE, LLP  
1919 PENNSYLVANIA AVE. NW, STE. 800  
WASHINGTON, DC 20006-3401  
FOR: NEXUS COMMUNICATIONS, INC.

JOSHUA GUYAN  
COUNSEL  
KELLEY DRYE & WARREN LLP  
3050 K STREET, NW, STE. 400  
WASHINGTON, DC 20007  
FOR: AMERIMEX COMMUNICATIONS CORP.DBA  
SAFETYNET WIRELESS

JOSHUA T. GUYAN  
COUNSEL  
KELLEY DRYE & WARREN LLP  
3050 K STREET, NW, STE. 400  
WASHINGTON, DC 20007  
FOR: GLOBAL CONNECTION INC. OF AMERICA  
DBA STAND UP WIRELESS



JOSHUA GUYAN  
COUNSEL  
KELLEY DRYE & WARREN LLP  
3050 K STREET, NW, STE. 400  
WASHINGTON, DC 20007-5108  
FOR: BOOMERANG WIRELESS, LLC

STEVEN A. AUGUSTINO  
KELLEY DRYE & WARREN LLP  
3050 K STREET NW, STE. 400  
WASHINGTON, DC 20007-5108  
FOR: TRUCONNECT COMMUNICATIONS, INC.

OLIVIA B. WEIN  
STAFF ATTORNEY  
NATIONAL CONSUMER LAW CENTER  
1001 CONNECTICUT AVE., NW., STE. 510  
WASHINGTON, DC 20036-5528  
FOR: NATIONAL CONSUMER LAW CENTER

MITCHELL F. BRECHER  
GREENBERG TRAUERIG LLP  
2101 L STREET, NW, SUITE 1000  
WASHINGTON, DC 20037  
FOR: TRACFONE WIRELESS, INC.

LANCE J.M. STEINHART  
ATTORNEY AT LAW  
LANCE J.M. STEINHART, P.C.  
1725 WINDWARD CONCOURSE, SUITE 150  
ALPHARETTA, GA 30005  
FOR: AIR VOICE WIRELESS, LLC

ALEX RODRIGUEZ  
STAKEHOLDER  
CGM, LLC  
104 SLOAN ST.  
ROSWELL, GA 30075  
FOR: CGM, LLC

PAUL MCALEESE  
CEO  
I-WIRELESS LLC  
1 LEVEE WAY, SUITE 3104  
NEWPORT, KY 41071  
FOR: I-WIRELESS LLC

MICHAEL DOVER  
KELLEY DRYE & WARREN LLP  
333 WEST WACKER DRIVE  
CHICAGO, IL 60606  
FOR: AMERICAN BROADBAND AND  
TELECOMMUNICATIONS COMPANY

MICHAEL R. DOVER  
ATTORNEY  
KELLEY DRYE & WARREN LLP  
333 W. WACKER DRIVE  
CHICAGO, IL 60606  
FOR: Q LINK WIRELESS LLC

HAYNES MORRIS  
8150 N. CENTRAL EXPRESSWAY, SUITE 670  
DALLAS, TX 75206  
FOR: BLUE JAY WIRELESS, LLC

JORDAN PINJUV  
PARTNER  
WILKINSON BARKER KNAUER LLP  
2138 W 32ND AVENUE, SUITE 300  
DENVER, CO 80211  
FOR: CTIA-THE WIRELESS ASSOCIATION

RICHARD CHABRAN  
CALIFORNIA COMMUNITY TECHNOLOGY POLICY  
1000 N ALAMEDA STREET, SUITE 240  
LOS ANGELES, CA 90012

CARLOS A. H. VAQUERANO  
EXECUTIVE DIRECTOR  
SALEF  
1625 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90015  
FOR: SALVADORAN AMERICAN LEADERSHIP AND  
EDUCATIONAL FUND (SALEF)

JESUS G. ROMAN  
MCIMETRO ACCESS TRANSMISSION SERVICES  
15505 SAND CANYON AVE. D201  
IRVINE, CA 92618  
FOR: VERIZON CALIFORNIA (U1002C)

JESUS ROMAN  
VERIZON  
15505 SAND CANYON AVENUE  
IRVINE, CA 92618  
FOR: CELLCO PARTNERSHIP (U 3001 C) DBA  
VERIZON WIRELESS

MIKE BAGLEY  
VERIZON WIRELESS  
BUILDING E. THIRD FLOOR  
15505 SAND CANYON AVENUE  
IRVINE, CA 92618

ROBERT GNAIZDA  
OF COUNSEL  
15 SOUTHGATE AVE., STE. 200  
DALY CITY, CA 94015  
FOR: NATIONAL ASIAN AMERICAN COALITION  
/ BLACK ECONOMIC COUNCIL / LATINO  
BUSINESS CHAMBER OF GREATER LOS ANGELES

KEN MCELDFOWNEY  
EXECUTIVE DIRECTOR  
CONSUMER ACTION  
1170 MARKET ST., SUITE 500  
SAN FRANCISCO, CA 94102  
FOR: CONSUMER ACTION

PRATIBHA TEKKEY  
DIR - COMMUNITY ORGANIZING  
CENTRAL CITY SRO COLLABORATIVE  
48 TURK STREET  
SAN FRANCISCO, CA 94102  
FOR: CENTRAL CITY SRO COLLABORATIVE  
(CCSROC)

KIMBERLY LIPPI  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5001  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: CAL ADVOCATES (PUBLIC ADVOCATES  
OFFICE) FORMERLY THE OFFICE OF  
RATEPAYER (ORA)

WILLIAM K. SANDERS  
DEPUTY CITY ATTORNEY  
CITY AND COUNTY OF SAN FRANCISCO  
CITY HALL, RM 234  
1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CA 94102-4682  
FOR: CITY AND COUNTY OF SAN FRANCISCO

ASHLEY SALAS  
ATTORNEY  
THE UTILITY REFORM NETWORK  
785 MAREKT ST., NO. 1400  
SAN FRANCISCO, CA 94103  
FOR: THE UTILITY REFORM NETWORK (TURN)

EDDIE AHN  
EXEC. DIRECTOR  
BRIGHTLINE DEFENSE PROJECT  
1028A HOWARD ST.  
SAN FRANCISCO, CA 94103  
FOR: BRIGHTLINE DEFENSE PROJECT

JAMES W. MCTARNAGHAN  
ATTORNEY  
PERKINS COIE LLP  
505 HOWARD STREET, STE. 1000  
SAN FRANCISCO, CA 94105  
FOR: CHARTER COMMUNICATIONS, INC.

JAMES W. MCTARNAGHAN  
ATTORNEY  
PERKINS COIE LLP  
505 HOWARD STREET, STE. 1000  
SAN FRANCISCO, CA 94105  
FOR: TIME WARNER CABLE

STEPHEN H. KUKTA  
SPRINT NEXTEL  
201 MISSION STREET, STE. 1500  
SAN FRANCISCO, CA 94105-1831  
FOR: SPRINT NEXTEL / SPRINT CORPORATION

MARGARET L. TOBIAS  
ATTORNEY  
TOBIAS LAW OFFICE  
460 PENNSYLVANIA AVE  
SAN FRANCISCO, CA 94107  
FOR: COX CALIFORNIA TELECOM, LLC DBA  
COX COMMUNICATIONS

JOHN L. CLARK  
ATTORNEY  
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: NEXUS COMMUNICATIONS, INC. D/B/A  
REACHOUT WIRELESS

MARK P. SCHREIBER  
ATTORNEY  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA STREET, 17TH FLOOR  
SAN FRANCISCO, CA 94111  
FOR: CALAVERAS

MARTIN A. MATTES  
ATTORNEY AT LAW  
NOSSAMAN GUTHNER KNOX & ELLIOTT, LLP  
50 CALIFORNIA STREET, 34TH FLOOR  
SAN FRANCISCO, CA 94111-4799  
FOR: CALIFORNIA PAYPHONE ASSOCIATION

ANITA C. TAFF-RICE  
LAW OFFICES OF ANITA TAFF-RICE  
1547 PALOS VERDES, SUITE 298  
WALNUT CREEK, CA 94597  
FOR: TC TELEPHONEM LLC

PETER HAYES  
PACIFIC BELL TELEPHONE COMPANY  
430 BUSH STREET, 5TH FL. NO. 3  
SAN FRANCISCO, CA 94108  
FOR: PACIFIC BELL TELEPHONE COMPANY

JOHN L. CLARK  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI & DAY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: TELRITE CORPORATION DBA LIFE  
WIRELESS

MARK P. SCHREIBER  
ATTORNEY  
COOPER, WHITE & COOPER LLP  
201 CALIFORNIA STREET, 17TH FL.  
SAN FRANCISCO, CA 94111  
FOR: CONSOLIDATED COMMUNICATIONS OF  
CALIFORNIA COMPANY (FORMERLY SUREWEST  
TELEPHONE)

KRISTIN L. JACOBSON  
ATTORNEY  
LAW OFFICES OF KRISTIN L. JACOBSON  
491 GRAY COURT, SUITE 1  
BENICIA, CA 94510  
FOR: SPRINT SPECTRUM L.P. AND ASSURANCE  
WIRELESS USA, L.P.

SUSAN E. WALTERS  
SVP  
CALIFORNIA EMERGING TECHNOLOGY FUND  
414 13TH ST., STE 200B  
OAKLAND, CA 94610  
FOR: CALIFORNIA EMERGING TECHNOLOGY  
FUND (CETF)

PATRICK M. ROSVALL  
PARTNER  
BRB LAW LLP  
436 14TH STREET, STE. 1205  
OAKLAND, CA 94612  
FOR: SMALL LECS: CALAVERAS TELEPHONE  
CO., CAL-ORE TELEPHONE CO., DUCOR  
TELEPHONE CO., FORESTHILL TELEPHONE CO.,  
HAPPY VALLEY TELEPHONE CO., HORNITOS  
TELEPHONE CO., KERMAN TELEPHONE CO.,  
PINNACLES TELEPHONE CO., THE PONDEROSA  
TELEPHONE CO., SIERRA TELEPHONE CO.,  
INC., THE SISKIYOU TELEPHONE CO.,  
VOLCANO TELEPHONE CO., WINTERHAVEN  
TELEPHONE CO.; SUREWEST TELEVIDEO

SHELLEY BERGUM  
CALIF. COMMUNICATIONS ACCESS FOUNDATION  
1333 BROADWAY STREET, SUITE 600  
OAKLAND, CA 94612

MARCIE ROTH  
EXECUTIVE DIRECTOR AND CEO  
WORLD INSTITUTE ON DISABILITY  
3075 ADELINE ST., SUITE 155  
BERKELEY, CA 94703  
FOR: WORLD INSTITUTE ON DISABILITY

RICHARD H. LEVIN  
ATTORNEY AT LAW  
130 SO. MAIN ST., STE. 202 / PO BOX 240  
SEBASTOPOL, CA 95473-0240  
FOR: CALIFORNIA ASSOCIATION OF  
COMPETITIVE TELECOMMUNICATIONS  
COMPANIES (CALTEL)

MARCO LIZARRAGA  
LA COOPERATIVA CAMPESINA DE CALIFORNIA  
1107 9TH ST., STE. 420  
SACRAMENTO, CA 95814  
FOR: LA COOPERATIVA CAMPESINA DE  
CALIFORNIA

SARAH J. BANOLA  
PARTNER  
BRB LAW LLP  
436 14TH STREET, STE. 1205  
OAKLAND, CA 94612  
FOR: FRONTIER CALIFORNIA INC. AND  
FRONTIER COMMUNICATIONS OF THE  
SOUTHWEST INC. CITIZENS  
TELECOMMUNICATIONS COMPANY OF  
CALIFORNIA INC., DBA: FRONTIER  
TELECOMMUNICATIONS OF CALIFORNIA

VINHCENT LE  
COUNSEL - TELECOM & TECH  
THE GREENLINING INSTITUTE  
360 14TH STREET 2ND FL  
OAKLAND, CA 94612  
FOR: THE GREENLINING INSTITUTE

MELISSA W. KASNITZ  
LEGAL DIR  
CENTER FOR ACCESSIBLE TECHNOLOGY  
3075 ADELINE STREET, STE. 220  
BERKELEY, CA 94703  
FOR: CENTER FOR ACCESSIBLE TECHNOLOGY

JACQUELINE KINNEY  
SVP & GEN. COUNSEL  
CA CABLE & TELECOMMUNICATIONS ASS'N  
1001 K STREET, 2ND F.  
SACRAMENTO, CA 95814  
FOR: CA CABLE & TELECOMMUNICATIONS  
ASSOCIATION

SERITA COX  
EXE. DIR.  
IFOSTER INC.  
PO BOX 159  
TRUCKEE, CA 96160  
FOR: IFOSTER, INC.

# Information Only

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## State Service

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ANNA JEW  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
COMM DIV.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CHRIS UNGSON  
CPUC - PUBLIC ADVOCATES OFFICE  
EMAIL ONLY  
EMAIL ONLY, CA 00000

LEGAL DIVISION  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MICHAELA PANGILINAN  
CPUC - COMMUNICATION DIV  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CHRISTOPHER POSCHL  
CALIF PUBLIC UTILITIES COMMISSION  
COMMUNICATIONS DIVISION  
320 West 4th Street Suite 500  
Los Angeles, CA 90013

PETER Y. CHANG  
CALIF PUBLIC UTILITIES COMMISSION  
BROADBAND, POLICY & ANALYSIS BRANCH  
320 West 4th Street Suite 500  
Los Angeles, CA 90013

ADAM CLARK  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER PROGRAMS BRANCH  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ANA MARIA JOHNSON  
CALIF PUBLIC UTILITIES COMMISSION  
COMMUNICATIONS AND WATER POLICY BRANCH  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

BEZAWIT DILGASSA  
CALIF PUBLIC UTILITIES COMMISSION  
TRANSPORTATION ENFORCEMENT BRANCH  
AREA 2-E  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER CHOW  
CALIF PUBLIC UTILITIES COMMISSION  
NEWS AND SOCIAL MEDIA  
ROOM 5301  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ELIZABETH PODOLINSKY  
CALIF PUBLIC UTILITIES COMMISSION  
ADMINISTRATION & BUDGET UNIT  
ROOM 5216  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JAMES AHLSTEDT  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PRICING AND CUSTOMER PROGRAM  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KIM HUA  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER PROGRAMS BRANCH  
AREA 3-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MARIA AMPARO WORSTER  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER PROGRAMS BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

NATHAN CHRISTO  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY & PAYPHONE ENFORCEMENT BRANCH  
AREA 2-E  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TONY TULLY  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER PROGRAMS BRANCH  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TRAVIS FOSS  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5026  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LINETTE YOUNG  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER AFFAIRS BRANCH  
300 Capitol Mall  
Sacramento, CA 95814