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Sent Via Email

January 27, 2017

Timothy J. Sullivan  
Executive Director  
California Public Utilities Commission  
timothy.sullivan@cpuc.ca.gov  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: AT&T California (U 1001 C) Request for Extension of Time for Compliance  
with Certain Ordering Paragraphs of Decision 16-12-066

Dear Sir,

Pursuant to Rule 16.6 of the Commission's Rule of Practice and Procedures, AT&T California (U 1001 C) is requesting an extension of time to comply with specific Ordering Paragraphs (OP) of Decision D.16-12-066 issued on January 4, 2017 associated with the Investigation (I.14-05-012) on Rural Call Completion Issues, Other Call Completion Issues, and Call Initiation Issues. Specifically, AT&T is requesting an extension of time to comply with those Ordering Paragraphs that mandate action prior to June 30, 2017.

This Decision and the accompanying Dissenting Opinion agree: the expansive scope of this proceeding deserves further discussion and active engagement. Granting this request for time extension will allow the stakeholders to accomplish this. Parties will have time to engage and have further discussions with the CPUC Staff, Cal OES offices, carriers and other stakeholders,<sup>1</sup> while working on a good faith effort in complying with the Decision's directives.

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<sup>1</sup> Such meetings are contemplated in Ordering Paragraphs 15, 17 and 22, which are ordered to be initiated by June 30, 2017.

**AT&T**



As an example, OP 7 instructs Carriers to hold a meet-and-confer with the 2-1-1 and 8-1-1 coalitions to discuss short code access and education, but both OP 5 and OP 6 imposes an early January 31, 2017 deadline for carriers to educate Multi-line Telephone subscribers and alter their short-code programming options. AT&T has begun to coordinate with other carriers to schedule such a meet-and-confer; once coordinated, AT&T intends to promptly reach out to the coalitions. An extension of time will allow the Carriers and the coalitions to meet, which in turn will inform, in a meaningful way, the education and programming efforts mandated in OPs 5 and 6.<sup>2</sup>

As a further example, in response to OP 16 AT&T is currently engaging Cal OES to determine the best manner to disseminate the mandated telephone number, as well as to develop protocols so that this newly mandated telephone number does not create conflicts with Cal OES' existing procedures (most notably, Cal OES' Service Warning Center's procedures). Once determined, AT&T will need to develop methods and procedures to receive and respond to calls made on the mandated number. An extension of time for compliance with OP 16 will allow Carriers to consult with Cal OES if any protocols are necessarily associated with this emergency contact process.

Therefore, AT&T respectfully requests an extension until June 30, 2017, for compliance with the following Ordering Paragraphs:

**Ordering Paragraph 1:** We direct the Consumer Protection and Enforcement Division and the Communications Division to seek data to analyze why for certain carriers there were large gaps between attempted calls and completed calls to or from California, based on Federal Communications Commission data, and shall recommend appropriate action to close that gap and ensure that calls are completed consistent with California Law.

**Ordering Paragraph 2:** Carriers that experience call completion problems going forward shall submit an itemized report on a quarterly basis, about call completion problems.

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<sup>2</sup> AT&T is concerned about the unintended consequences of OP 6. The mandate preempts an MLTS service subscriber's preferences regarding line-blocking. In this regard, this proceeding simply did not consider possible legitimate reasons why business enterprises and government agencies choose certain line-blocking options. Instead, a directive is imposed on the universe of MLTS subscribers. This directive with such an immediate deadline also fails to consider the need to provide notice to MLTS subscribers.



**Ordering Paragraph 5:** We direct carriers to commence educating their Multi-line Telephone System customers about steps to enable short code access.

**Ordering Paragraph 6:** We order carriers who program Multi-line Telephone System (MLTS) systems to commence such programming on behalf of their customer or provide MTLS systems (whether premise, cloud, or Centrex-based) to enable short codes, with an opt-out for customers for short codes except for 9-1-1, 8-1-1, 2-1-1, and 7-1-1 in light of the public safety and health services available upon reaching these short codes. Carriers shall maintain the proper underlying call directions to complete the call to the proper agency or short code destination.

**Ordering Paragraph 7:** Carriers shall hold a meet and confer with the 2-1-1 coalition and the 8-1-1 coalition, as described herein to discuss short code access and education.

**Ordering Paragraph 11:** We direct the telecommunication companies to evaluate the practice of attaching facilities to trees. The report shall include, at a minimum, the following information:

- Number of trees that have telecommunication facilities attached to them;
- Evaluation of risk posed by the attachments to trees, including impacts on service outages, reliability, and safety;
- Description of practices adopted by the company to ensure that the trees carrying telecommunication facilities are not hazardous, diseased or dying, or near other trees that are diseased or dying as pests can move from tree to tree; and
- Estimate of cost to move facilities from trees onto poles.

**Ordering Paragraph 16:** Respondents shall provide to city, county, and federally recognized tribal Office of Emergency Services officials an emergency contact name and number available 24 hours a day, 7 days a week, that is not a general public 800 or 8xx number.



AT&T places great value in the guidance that CPUC Staff, Cal OES and other stakeholders can provide in implementing these directives. Accordingly, AT&T respectfully requests a time extension so that compliance with these directives deliver the intended value and benefits.

Sincerely,

A handwritten signature in black ink, which appears to read "L. Potanfaral", is positioned below the "Sincerely," text.

cc: Michael Amato, Eric Van Wambeke, Administrative Law Judge Division,  
Service List for I.14-05-012

**AT&T**

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

Order Instituting Investigation to Address Intrastate  
Rural Call Completion Issues.

Investigation 14-05-012  
(Filed May 15, 2014)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing **AT&T CALIFORNIA REQUEST FOR EXTENSION OF TIME FOR COMPLIANCE WITH CERTAIN ORDERING PARAGRAPHS OF DECISION 16-12-066**, on all known parties to **I.14-05-012** listed in the attached Service List, as well as Executive Director Sullivan and Communications Division Director Michael Amato by electronic mail, U.S. Mail, and/or hand-delivery.

Executed this 27th day of January 2017, at San Francisco, California.

**AT&T, INC.**  
430 Bush Street, 3<sup>rd</sup> Floor  
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\_\_\_\_\_  
/s/

Thomas J. Selhorst

**PROCEEDING: I1405012 - CPUC - OII TO ADDRES**  
**FILER: CPUC**  
**LIST NAME: LIST**  
**LAST CHANGED: DECEMBER 28, 2016**

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