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

Order Instituting Rulemaking Proceeding to
Consider Changes to the Commission's Carrier of
Last Resort Rules.

R. 24-06-012

**REVISIONS TO INITIAL PROPOSALS OF
CONSOLIDATED COMMUNICATIONS OF CALIFORNIA COMPANY (U 1015 C)**

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I. INTRODUCTION.

In accordance with the procedural schedule outlined in the Order Instituting Rulemaking (“OIR”) that initiated this proceeding, Consolidated Communications of California Company (U 1015 C) (“Consolidated”) hereby provides these revisions to its initial proposals addressing the California Public Utilities Commission’s (“Commission”) Carrier of Last Resort (“COLR”) rules. The OIR specified December 6, 2024 as the deadline to submit revisions to initial proposals, which makes this filing timely.

After reviewing the filings to date made in response to the OIR and conferring with Pacific Bell Telephone Company d/b/a AT&T (“AT&T”), Consolidated supports the proposed schedule that AT&T will be filing as a revision to its initial proposals. In addition, Consolidated urges the Commission to decline the invitation extended by consumer groups to expand this proceeding beyond the fundamental purpose of this proceeding, which is to examine the merits of the COLR rules, which are nearly thirty years old, in light of the modern competitive landscape in the telecommunications sector.

II. THE COMMISSION SHOULD ADOPT THE SCHEDULE IDENTIFIED IN AT&T’S REVISIONS TO INITIAL PROPOSALS.

As part of an effort to agree on a common procedural schedule, Consolidated has conferred with AT&T regarding an efficient process for updating outdated COLR rules. Consistent with Consolidated’s prior comments in this proceeding, the AT&T schedule contemplates providing priority consideration to revisions to COLR rules in areas where competition is vibrant. Consideration of COLR relief in these areas should take place in a Phase One of the proceeding.¹ In Phase Two of the proceeding, the Commission should consider appropriate revisions to COLR rules in those areas where competition is less vibrant, particularly in rural areas. Attachment A to this filing provides the proposed schedule for this proceeding, which is the same schedule that AT&T is concurrently filing with its own revisions to its initial proposals.

¹ AT&T also proposes to address the issues related to areas where there are no discernible customers in Phase One. This issue has not been a focus for Consolidated, but Consolidated does not oppose its inclusion in Phase One.

III. THE COMMISSION SHOULD FOCUS ITS RESOURCES ON APPROPRIATE REVISIONS TO DECADES OLD COLR RULES.

In opening comments, several parties urge the Commission to expand the “basic service” concept to include broadband.² As Consolidated has advocated in its prior filings in this proceeding, the Commission should decline to expand this proceeding into an inquiry whether to regulate broadband services.

The COLR rules are focused on the delivery of voice services. COLR responsibilities represent a discrete element of the regulation of voice services. A proceeding focused on revisions pertaining to a discrete element of the regulation of voice services is not the venue in which to explore the baseline issue of whether the Commission even has the requisite authority to regulate the delivery of broadband services, let alone wrestling with the complicated issues of how to regulate the delivery of broadband services in the event the Commission were to conclude it could regulate such services. Although existing state and federal legal frameworks do not allow the Commission to regulate the delivery of broadband services, if the Commission is inclined to explore that possibility, it should open a new proceeding with notice to all potentially interested stakeholders that the Commission is exploring the substantial expansion of its regulatory jurisdiction. On that basis, the Commission should refrain from expanding the scope of this proceeding as advocated by consumer groups.

IV. CONCLUSION.

The Commission should prioritize relief from COLR obligations in urban/suburban areas consistent with the schedule proposed by AT&T in its revisions to initial proposals contemporaneously filed with these revisions. To that end, the Commission should divide this proceeding into two separate phases, one addressing COLR issues in urban/suburban areas based on competitive factors and another to address COLR issues in rural areas. Furthermore, the Commission should target its efforts in this proceeding at updating outdated COLR rules applicable to the delivery of voice services instead of engaging in controversial attempts to expand its regulatory jurisdiction over the delivery of broadband Internet access service.

² See Initial Proposal of the Public Advocates Office (“Cal Advocates”) at 11-23; Initial Proposal of The Utility Reform Network, the Communications Workers of America, District 9, and the Center for Accessible Technology (“TURN/CWA/CforAT”) at 37-39.

Respectfully submitted on December 6, 2024 at Oakland, California.

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Attachment A

COLR PROPOSED SCHEDULE

Prehearing Conference	December 13, 2024
Scoping Memo	January 2025

Phase One

Workshops with Party Participants & Neutral Mediator	January 2025
Staff Report on Workshops	February 2025
Opening & Reply Comments	March 2025
Proposed Decision	June 2025
Opening & Reply Comments on Proposed Decision	July 2025
Commission Decision	August 2025 (No later than 60 days after PD)

Phase Two

Workshops with Party Participants & Neutral Mediator	September 2025
Staff Report on Workshops	October 2025
Opening & Reply Comments	November 2025
Proposed Decision	February 2026
Opening & Reply Comments on Proposed Decision	March 2026
Commission Decision	April 2026 (No later than 60 days after PD)