

**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)

**COMMENTS OF PACIFIC BELL TELEPHONE COMPANY  
DBA AT&T CALIFORNIA (U 1001 C) TO PHASE II SCOPING MEMO  
AND RULING OF ASSIGNED COMMISSIONER**

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April 3, 2017

Pursuant to Section 4 of the Phase II Scoping Memo and Ruling of Assigned Commissioner, Pacific Bell Telephone Company d/b/a/ AT&T Communications of California (“AT&T”) offers these comments on the directives of Ordering Paragraphs (“OPs”) 21 and 22<sup>1</sup> of D.16-12-066 issued in this proceeding.

OPs 21 and 22, read together, advocate for a Working Group to address network outage reporting, call completion reporting, and communication with first responders. AT&T strongly supports this collaborative approach, which allows necessary participation of the critical stakeholders and subject matter experts identified in these OPs.

In addition, such a collaborative process can directly address those infirmities presented in the dissents of Commissioners Peterman and Randolph to the D.16-12-066.

Dated: April 3, 2017

Respectfully submitted,

By: \_\_\_\_\_ /s/

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<sup>1</sup> OP 21: “Phase 2 of this Proceeding shall explore whether the Commission should require Carriers of Last Resort or other respondents or other carriers under the Commission’s jurisdiction to report outages to the California State Warning Center of Cal. Office of Emergency Services, and city, county, and federally recognized tribal Office of Emergency Services official contacts. This Phase shall evaluate the suitability of the thresholds, procedures, and results of the reporting.”

OP 22: “By June 30, 2017, Phase 2 shall convene a Working Group including Communications Division, Safety and Enforcement Division, the parties, and invite Cal. Office of Emergency Services, and city, county, and federally recognized tribal Office of Emergency Services officials, and the California Utility Emergency Association to discuss and recommend outage reporting thresholds, requirements, and protocols that reflect California’s public safety needs and this Commission’s responsibilities, including discussion of call completion reporting and improving communications between carriers and first responders during emergency situations.”