



COMMUNICATIONS DIVISION
ADVICE LETTER SUMMARY FORM

CD 04-2025

Complete and submit via email to: TD. PAL@cpuc.ca.gov the CD Advice Letter Summary form and attach to the cover letter, supporting documents, if any, and the service list.

Date Advice Letter Served to TD.\_PAL and Service List: 08/25/2025 Utility ID: U- 7334 -C

Utility Name: Synergem Technologies, Inc.

Advice Letter No.: 16 Requested Effective Date: 09/24/2025

Advice Letter Tier Level: Information-Only Filing I II III

Advice Letter Subject: Involuntary Service Discontinuance for NG 911 Service in Schedule Cal. P.U.C. 1-T

Authorization for Filing: General Order 96-B

Keyword: Service Changes

Complete (a)-(c) if Keyword Selected: Contract(s)

(a) Date Executed:

(b) Contract Type: [Contract Type]

(c) Total Revenue Amount:

Notes/Comments:

Table with 4 columns: Contact Information, Full Name, Title, Email Address, Telephone No. Rows include Utility Filer and Advice Letter Certificate.

PROTEST(S) AND RESPONSE(S) TO PROTEST

General Order (GO) 96 -B General Rules 7.4

Email Protest/Response to Protest : TD.\_PAL@cpuc.ca.gov and the Utility on the same day.

CPUC Communications Division-Advice Letter Coordinator

505 Van Ness Avenue, San Francisco, California 94102

EMAIL ONLY (DO NOT MAIL HARD COPY UNLESS REQUESTED)

CONFIDENTIAL TREATMENT INFORMATION

Decision (D.)16-08-024, D.20-08-031 (corrected by D.21-09-020) and GO 66-D

Have problems sending the Advice Letter via direct email?

Send your advice letter package via CPUC's Secure File Transfer Protocol (FTP) /Kiteworks



**iCommLaw®**  
1547 Palos Verdes, #298  
Walnut Creek, CA 94597  
Phone: (415) 699-7885  
Facsimile: (925) 274-0988  
anita@icommlaw.com

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August 25, 2025

Via Electronic Submission

Telecommunications Division  
California Public Utilities Commission  
505 Van Ness Ave.,  
San Francisco, CA 9410  
TD.\_PAL@cpuc.ca.gov

Re: Advice Letter 16 – *Synergem Technologies, Inc. (U 7334 C) Involuntary Service Discontinuance for NG 911 Service in Schedule Cal. P.U.C. 1-T*

To the PAL Coordinator:

Synergem Technologies, Inc. (“Synergem”) (U 7334 C) hereby submits this Tier II Advice Letter to discontinue Next Generation 911 (“NG 911”) service throughout its service area in California. On August 20, 2019 California Emergency Services (“CalOES”) awarded Synergem one of four regional contracts to provide NG 911 service in the Northern Region, as defined in that contract. CalOES requested that all contract awardees incorporate the rates, terms and conditions from the NG 911 contract into a tariff to be filed with the California Public Utilities Commission (“Commission”). The Commission responded by issuing guidance to carriers that “9-1-1 network services and next generation 911 delivery to PSAPs must be tariffed in California.”<sup>1</sup>

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<sup>1</sup> Exhibit 1 is a true and correct copy of the Commission’s guidance issued to carriers available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/information-for-telecommunications-applicants-and-registrants-in-california/911-guideline>.

On June 7, 2019, Synergem submitted Advice Letter 5 to the Commission setting to establish a tariff that set forth the rates, terms and conditions of the NG 911 contract for CalOES. The Commission approved the tariff on September 6, 2019. The NG 911 contract with CalOES expired on August 19, 2024, and since that time, CalOES has purchased NG 911 service solely from Synergem's tariff.<sup>2</sup> Pursuant to General Order 96-B, Synergem has submitted an advice letter for approval of changes to the tariffed NG 911 services provided to CalOES.

CalOES notified Synergem that it intends to decommission the regional NG 911 network and apparently terminate purchasing service from Synergem's tariff and instead move to a single-vendor architecture for NG 911. Because Synergem's NG 911 tariff is a codification of the terms of its contract with CalOES, there is no possibility that any other customer would purchase the same NG 911 service and therefore Synergem will need to discontinue the service and withdraw its tariff.

During the period when CalOES had requested that NG 911 providers tariff their services, the Commission issued guidance to carriers stating that NG 911 service must be tariffed, and that such tariffs are subject to all requirements of General Order 96-B and associated Commission orders. Rule 1.16 of the Telecommunications Industry Rules in GO 96-B defines a withdrawal of service as "discontinuing a service's availability to all customers, including those customers receiving the service as of the date it is withdrawn." Therefore, Synergem is submitting this advice letter seeking review and approval prior to withdrawing the NG 911 service. CalOES has not provided an exact date of termination of the NG 911 service, but given the importance of NG 911 to the health and safety of

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<sup>2</sup> Exhibit 2 is a true and correct copy of an email from CalOES staff stating that the NG 911 contract had expired and NG 911 services would be purchased from Synergem's tariff from August 2024 forward.

Californians, Synergem is notifying the Commission with advance notice of the impending withdrawal of NG 911 service in California.

The NG 911 contract was part of CalOES' effort to upgrade the existing 911 network to incorporate important new IP-based features and functions, such as redundant network facilities and the ability to accommodate texts to Public Safety Answering Points ("PSAPs") and improved location services for calls to 911 including from cell phones. CalOES has continued to operate the legacy TDM 911 network until a full cutover to the NG 911 network was possible.

Synergem has substantially completed its IP-based NG 911 network and is currently carrying 911 voice traffic to four (4) Public Safety Answering Points ("PSAPs"). Additional PSAPs were due to be added starting in late 2024, with the eventual cutover to the NG 911 network expected in in 2025. CalOES, however, issued a "pause" in deployment in late 2024, ostensibly to work with Synergem and the other NG 911 providers to improve the processes and ensure that the ensuing rollout would be successful. Synergem maintained service to existing PSAPs during this time and continued to expand the deployment of the ALI replacement service throughout its Region, as directed by CalOES.

During a meeting scheduled by CalOES in June 2025, however, CalOES notified Synergem that it intends to dismantle the NG 911 Regional Network Provider architecture and convert all accounts to a single NG 911 vendor network to service the entire State.<sup>3</sup>

CalOES is the only customer receiving NG 911 service from Synergem's tariff, and the tariff codifies the CalOES contract. Synergem is being directed to take steps that

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<sup>3</sup> Exhibit 3 is a true and correct copy of the CalOES letter announcing it is decommissioning the NG 911 network.

will alter the terms of its NG 911 tariff, in a way that results in a withdrawal of NG 911 service to the existing customer, thus this advice letter approval is necessary.

No Commission order requires or authorizes Synergem to withdraw its NG 911 service, therefore an advice letter (or possibly an application) is required. In its guidance to NG 911 providers, the Commission stated that “[p]roviding access to emergency services to end users is a required component of basic service for landline providers.”<sup>4</sup> Telecommunications Industry Rule 8.6 requires that an application be filed with the Commission requesting permission to withdraw a basic service. However, Synergem provides service to CalOES and PSAPs, not end users, so it appears that a Tier 2 advice letter may be appropriate. Synergem stands ready to file a formal application for withdrawal of its NG 911 service if directed by staff. If a Tier 2 advice letter is deemed to be appropriate, Telecom Industry Rule 3 and 3.2 require 30-day notices, which will be sent to affected customers upon approval of this advice letter.

The Commission has consistently held that 911 services are critical to the safety and well-being of all Californians, and the CalOES directions to Synergem will result in the withdrawal of a critical element of public safety. Synergem is providing sufficient information in this advice letter to ensure the Commission is fully informed about Synergem’s involuntary discontinuance of service and the resulting negative impact on public safety.

Specifically, the proposed CalOES direction would contradict the original design and intention of the California NG 911 architecture, which was to identify Regional

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<sup>4</sup> Exhibit 1 is a true and correct copy of the Commission’s guidance issued to carriers available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/information-for-telecommunications-applicants-and-registrants-in-california/911-guideline>.

providers as the primary NG 911 carriers for each Region which would then invest in the local knowledge and infrastructure supporting the specific needs of each Region. The statewide carrier was designed primarily as a backup system. Having a single statewide primary provider means that any outage experienced by this provider would likely extend to cover the entire State. This has actually been the experience in places where a single statewide provider has been deployed.

Given the importance of the NG 911 upgrade, Synergem stands ready to provide any additional information staff believes would be helpful as they consider the withdrawal of Synergem's NG 911 service, including the timing and possible risks to Californians of CalOES relying largely on the legacy 911 system for an indefinite period as they consider whether Synergem may withdraw its NG 911 service due to CalOES' decision to decommission the NG 911 network.

Copies of this Advice Letter were served on the Commission's Advice Letter Service list maintained on its website. Additionally, the Advice Letter will be made available to any interested party who contacts the undersigned at the address above. Anyone may protest this Advice Letter within 20 days. Any protest must set forth the specific grounds on which it is based, must be made in writing, and must be timely filed with the Commission.

The address for mailing and delivering a protest to the Commission is:

Director, Telecommunications Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 3203  
San Francisco, CA 94102

A copy of any protest must be mailed to Synergem Technologies, Inc. on the same

date as it is mailed or delivered to the Commission. The addresses for mailing or delivering a protest to the company are as follows:

iCommLaw  
ANITA TAFF-RICE  
1547 PALOS VERDES, # 298  
WALNUT CREEK, CA 94597  
anita@icommlaw.com

Synergem Technologies, Inc.  
JEFF SCHLUETER  
371 WINDRUSH LANE  
MOUNT AIRY, NC 27030  
jschlueter@synergemtech.com

Please contact us if there are any questions regarding this advice letter.

Sincerely,

/s/ Anita Taff-Rice  
*Counsel for Synergem Technologies, Inc.*

**EXHIBIT 1**

**A TRUE AND CORRECT COPY OF THE  
COMMISSION'S GUIDANCE ISSUED TO CARRIERS**

## **Guidance for Communications Service Providers who are now providing or plan to offer Next Generation 9-1-1 Services in California.**

### **911 Service Providers Must be CPCN Holders**

Service providers/carriers who provide 9-1-1 network services, regardless of whether or not those services are IP-based, must be CPCN holders. Providing access to emergency services to end users is a required component of basic service for landline providers. Wireless carriers and VoIP providers are also required to provide their end users with the ability to access and complete 9-1-1 calls.

- Additional information regarding CPCN authority can be found here: <http://www.cpuc.ca.gov/General.aspx?id=1019>
- **D. 12-12-038** - The current definition of basic service requires that customers be provided free and unlimited access to emergency 911/E911 services. Having access to emergency services is essential for all consumers. Accordingly, the existing standards for basic service standards and requirements for access to 911/E911 services shall continue to apply.
- **D.06-03-013** - In revising General Order (G.O.) 168, the Commission extended the 9-1-1 requirements to wireless carriers, as well as unequivocally recommitted to public safety and recognized the importance of our 9-1-1 system to public safety.

### **CPCN Holders Must Tariff 911 Services**

9-1-1 network services and next generation 911 delivery to PSAPs must be tarified in California. For filing tariffs, carriers should use Telecommunications Industry Rule 8.3 for new services or Telecommunications Industry Rule 8.4 for changes to tarified rates, charges, terms, or conditions. These 9-1-1 network services filings are appropriate for a Tier 1 Advice Letter.

- **D.07-09-018** - The Commission specifically excluded 9-1-1 services from de-tariffing. Additionally, the 9-1-1 system should not be de-tariffed because it provides an important public service that must be available to all phone customers.
- **D. 13-07-019** – The Commission reaffirmed its policy that 9-1-1 and other emergency services should remain tarified. Further, the Commission stated that related rates and charges should remain cost-based, as previously stated in Resolution T-14043.
- **G.O. 96B, General Rule 5.** - The primary use of the advice letter process is to review a utility's request to either change its tariffs in a manner previously authorized by statute or Commission order, to conform their tariffs to the requirements of a current statute or Commission order, or to get Commission authorization to deviate from its tariffs.

### **9-1-1 Network Service Tariffs Must Include Pricing Information**

Carriers who currently provide 9-1-1 network services and have published tariffs without pricing information are instructed to file Tier 1 advice letters with the updated information on their service offerings, which include pricing. 9-1-1 tariffs should be cost-based.

**EXHIBIT 2**

**A TRUE AND CORRECT COPY OF EMAIL MOVING  
TO TARIFF AFTER CONTRACT EXPIRED**

**From:** Chen, Angela@CalOES <Angela.Chen@CalOES.ca.gov>  
**Sent:** Wednesday, September 11, 2024 5:12 PM  
**To:** Alan Collicott  
**Subject:** Invoices for the month of August services

**Importance:** High

Good afternoon Alan,

Hope things are going well!

It was brought to my attention regarding the batch of August invoices. Since the NG contract expired mid-August (8/19), the State Controller's Office are rejecting invoices that goes beyond the expired date.

At this time, we kindly request the batch of August 2024 invoices must be re-invoice to reflect the end date on the invoice matches the end date of the contract. The service dates on the August invoices shall be: 8/1 – 8/19/ 2024.

For future invoices, please remove the following and replace with '**Utility Tariff**'.

Contract Number  
Contract Expiration Date

Please reach out if you have any questions.

Thank you,

*Angela Chen*

California Governor's Office of Emergency Services  
Public Safety Communications Office  
CA 9-1-1 Emergency Communications Branch  
Office: 916.894-5029

[www.caloes.ca.gov](http://www.caloes.ca.gov)

[www.caloes.ca.gov/911](http://www.caloes.ca.gov/911)



**EXHIBIT 3**

**A TRUE AND CORRECT COPY OF  
CALOES LETTER ANNOUNCING DECOMMISSION OF NG-9-1-1  
DATED JUNE 20, 2025**



June 20, 2025

Myron Herron  
President  
Synergem Technologies, Inc.  
371 Windrush Lane  
Mount Airy, NC 27030

Subject: Follow Up

Thank you for the continuing partnership and discussions, particularly the conversations this week. As discussed, we have been assessing the best contract and deployment strategy moving forward. We are reframing the architecture and operations of the project to a statewide architecture, rather than the current regionalized approach. This will require a thoughtful transition with your participation. We will develop and execute a transition plan over roughly the next six months. Together, we will design a transition that supports the 911 system and considers impacts to your organization.

As you know, the Governor's Office of Emergency Services (Cal OES) paused the migration of additional Public Safety Answering Points (PSAPs) to allow us the time to better understand the PSAPs experiences and identify opportunities to improve and ease the migration of future PSAPs. Through those conversations with the PSAPs and vendor partners, we've concluded that there are actions we must take to improve the project.

Together, Cal OES and our vendor partners have worked to transition California from the legacy 911 system to the NG 911 network. We have accomplished much, including the installation of necessary infrastructure across the state, structural changes at many PSAPs, installation of circuits, and establishment of NG 911 core services. To date, we've migrated 23 PSAPs to the NG 911 network.

We know that you share our commitment to public safety, and we are confident that we will continue to work as partners. To be clear, this transition is



3650 SCHRIEVER AVENUE, MATHER, CA 95655  
(916) 845-8506 TELEPHONE (916) 845-8511 FAX  
[www.CalOES.ca.gov](http://www.CalOES.ca.gov)

Myron Herron  
June 20, 2025  
Page 2

to improve the design Cal OES previously established for NG 911. Furthermore, this transition is not a reflection of vendor performance and does not impact any existing contractual arrangements you may have or future procurements with the State of California. You continue to be eligible to compete in future procurements for NG 911 services.

Thank you for your continued partnership and we look forward to more discussions.

Sincerely,



LISA MANGAT  
Chief Deputy Director

c: Frank Holt, CEO  
Jeff Schluter, CTO



## California Public Utilities Commission

### Any Advice Letter not fitting within the preceding categories.

**NOTE:** If you want to be removed from a list, please send an email to: [telcoadviceletterservice@cpuc.ca.gov](mailto:telcoadviceletterservice@cpuc.ca.gov)

Select another list

First Name	Last Name	Email Address	Company	UNumber	Date Submitted
eric	van wambeke	evw@cpuc.ca.gov	CPUC		2/22/2012
Ross	Johnson	att-regulatory-ca@att.com	AT&T California	1001	2/24/2012
Steve	Fetzer	sfetzer@4cct.com	CCT Telecomm		3/1/2012
John	Gutierrez	John_Gutierrez@cable.comcast.com	Comcast Phone of California, LLC	U-5698-C	3/1/2012
PHILIP	JOSEPHSON	PJOSEPHSON@STERLINGBUSINESSLAW.COM	TNCI		3/5/2012
KAREN	MCBEE	TRUCKEE25@AOL.COM	PPG COMMUNICATIONS		3/6/2012
Michelle	Salisbury	michelle.salisbury@crowncastle.com	CA - CLEC LLC & NewPath Networks, LLC	6936 & 6928	3/13/2012
Karen	Ritter	CAservicelist@tminc.com			4/2/2012
davina	hunter	davinahunter29@gmail.com			4/23/2012
Winafred	Brantl	wbrantl@kelleydrye.com	Kelley Drye & Warren LLP		4/24/2012
Craig	Teal	cteal@pointtopointinc.com	Point to Point, Inc.	6066	5/1/2012
Dean	LaChapelle	deanvic@yahoo.com	Point To Point Inc	6066	6/12/2012
Charlie	Born	Charlie.Born@ftr.com	Frontier Communications	1024	6/26/2012
Risa	Hernandez	rhh@cpuc.ca.gov	CPUC		7/6/2012
Steven	Fenker	steve@tsihomphone.com	Nexus Communications	U-4387-C	9/17/2012
John	Clark	jclark@goodinmacbride.com			11/14/2012
Stefanie	Edwards	sedwards@bluecasa.com	Blue Casa Telephone		12/3/2012
Bill	Peters	bill.peters@argusmedia.com	Argus Media	N/A	2/26/2013
Kristopher	Twomey	kris@lokt.net			5/23/2013
Margaret	Tobias	info@tobiaslo.com			6/18/2013
Heather	Kirby	hkirby@telecomcounsel.com	Lance J.M. Steinhart,		6/24/2013

			P.C.		
Inna	Vinogradov	inna@icommlaw.com			8/6/2013
Paula	Schneider	paula@crockerlawfirm.com	Crocker & Crocker		8/9/2013
Scott	Kellogg	scottekelllogg@me.com	Kellogg Law Group, LLC		8/12/2013
Nicole	Winters	Nicole.Winters@windstream.com	Windstream		8/16/2013
Kristin	Manwarren	regulatory@intelepeer.com	IntelePeer	U-7175-C	8/19/2013
N.A.	Tannenbaum	cpuclists@gmail.com			9/8/2013
Angel	Barragan	Angel@FirelineBroadband.com			11/21/2013
G	Rogers	grogerswcms@live.com			2/2/2014
Timothy	Naple	tnaple@luxbridge.com	LuxBridge		2/6/2014
Todd	Lantor	TLantor@fcclaw.com	Lukas, Nace, Gutierrez & Sachs, LLP		5/30/2014
Douglas	Denney	dkdenney@integratelecom.com	Electric Lightwave, LLC	5377	8/13/2014
Patti	Ringo	paringo1@gmail.com			8/24/2014
Virginia	Morales	thelegend831@live.com	Choke Wireless Communications		9/15/2014
Patrice	Rogers	progers@rtcteam.net	RTC Associates, LLC		10/10/2014
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Susan	Berlin	susan.berlin@telrite.com	Life Wireless	U-4442-C	3/3/2016
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Katherine	Marshall	kmarshall@potomaclaw.com			2/13/2017
			CPUC Office of		

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Cassandra	Milligan	cassandra.milligan@tagmobile.com	TAG Mobile, LLC	U-4411-C	8/22/2017
Dale	Wiltshire	dale@fatpbx.com	Fresno Area Telephone & PBX	U-1420-C	9/12/2017
J.G.	Harrington	jgharrington@cooley.com			1/12/2018
Jack	Conklin	jhcon@hotmail.com	Dr.		2/16/2018
Kevin	Rhoda	krhoda@telecomreg.com	Rowland & Moore LLP		3/2/2018
Kelly	Faul	kelly.faul@verizon.com	XO Communications Services, LLC	U-5553-C	3/12/2018
Ken	Garnett	kgarnett@cal.net	Cal.net, Inc.	U-1340-C	3/20/2018
Lesli	Rowe	lesli.rowe@viaoneservices.com	SafetyNet Wireless	U-4458-C	3/26/2018
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Matt	Dean	regcompliance@telecompliance.net	Telecom Professionals, Inc.		4/4/2018
Bob	Kelly	bkelly@swwc.com			4/20/2018
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Jennifer	Carter	jcarter@gcioa.com	Global Connections Inc. of America		7/23/2018
Jason	VanArsdall	jvanarsdall@standupwireless.com	StandUp Wireless		8/28/2018
Choua	Her	choua.her@mossadams.com	Moss Adams		10/1/2018
G. Joseph	Buck	complaint.Frontier@gmail.com	Frontier California Inc.	U1002C	10/6/2018
Karen	Higgs	Karen.Higgs@motorolasolutions.com	Vesta Solutions, Inc.	U-7348-C	11/7/2018
Jerry	Weikle	jweikle@windstream.net			12/12/2018
Ashley	Salas	asalas@turn.org	The Utility Reform Network (TURN)		1/7/2019
Shelly	Lyser	shelly.lyser@cpuc.ca.gov			3/12/2019
Kristin	Jacobson	kristin@kljlegal.com	Law Offices of Kristin L. Jacobson		3/15/2019
TD	PAL	TD._PAL@cpuc.ca.gov	CPUC Communications Division		3/27/2019
Phil	Rotheram	phil.rotheram@atos.net	Atos Public Safety		4/8/2019
Lydia	Freemon	lydfreemon@gmail.com			5/25/2019
Karen	Wolf	karen.wolf@motorolasolutions.com	Vesta Solutions, Inc.	U7348C	6/4/2019
Susan	Ornstein	susan.ornstein@comtechtel.com	TeleCommunication Systems, Inc.		6/4/2019

Crystal	Prahl	crystal.prahl@charter.com			10/14/2019
Paul	Porter	paul.porter@ooma.com	Ooma, Inc.	1291	10/16/2019
Frank	App	Frank.App@charter.com	Charter Communications		10/24/2019
Randy	Whitehead	randy@infrastructurerealty.com	Infrastructure Realty Trust		10/25/2019
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linda	peng	lindapeng@comnet-telecom.com	ComNet(USA) LLC	U-7330-C	2/13/2020
Teresa	Bitterling	teresa@crockerlawfirm.com	Crocker & Crocker	U-6641-C	3/2/2020
Tommy	Johnson	tommy.johnson@charter.com	Time Warner Cable Information Services (California)	6874	3/31/2020
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Wendy	Perez	accounting@evocative.com	Fiber International	U-7227C	4/27/2020
Kristin	Jacobson	kristin.jacobson@us.dlapiper.com	DLA Piper		5/1/2020
Jody	Kannally	jody.kannally@theswitch.tv	The Switch Enterprises, LLC	0002460434	5/13/2020
Raisa	Ledesma Rodriguez	raisa.ledesma@cpuc.ca.gov	Public Advocates Office		5/17/2020
Aja	King	AKing@jenner.com			8/5/2020
Katie	Zack	kzack@telecomcounsel.com	Lance JM Steinhart PC		9/4/2020
kieuchinh	tran	kieuchinh.tran@cpuc.ca.gov			9/14/2020
Wesley	Liu	liuhq1@chinaunicom.cn	China Unicom Americas Operations Ltd	U-4507-C	9/24/2020
Aggie	Hill	aggie@icommlaw.com	iCommLaw		10/14/2020
Zeb	Zankel	CPUCfilings@jenner.com			10/21/2020
Anita	Taff-Rice	anita@icommlaw.com			11/8/2020
Kate	Beck	kate.beck@cpuc.ca.gov			12/2/2020
Stephen	Milton	cpuc-advice@isofusion.com			12/18/2020
Mark	Schreiber	mschreiber@cwclaw.com	Cooper, White & Cooper LLP		1/4/2021
Steven	McFerson	mcferson.steve@gmail.com			1/5/2021
Jeanette	Green	jgreen@uc-green.com	UC-Green Communications		1/6/2021
Jim	Burt	James.R.Burt@charter.com			1/6/2021
Darren	Lee	darren@brblawgroup.com	BRB Law LLP		3/8/2021
Mindy	Duvall-Harris	mindyd@ponderosatel.com			5/20/2021
Kerry	Grimes	kerry.grimes7@t-mobile.com	T-Mobile		9/8/2021
CDCompliance	CPUC	CDCompliance@cpuc.ca.gov			10/5/2021
Louis	Lupinacci	louis.lupinacci@t-mobile.com	Assurance Wireless		11/24/2021
Al	Aksterowicz	al.aksterowicz@t-mobile.com	T Mobile		11/24/2021
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