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September 15, 2025

Via Electronic Submission

Telecommunications Division
California Public Utilities Commission
505 Van Ness Ave.,
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TD._PAL@cpuc.ca.gov

Re: NGA911 (U-7347-C) Reply to Protests to Advice Letter 20 - *Involuntary Service Discontinuance for NG 911 Service in Schedule Cal. P.U.C. 1-T*

To the PAL Coordinator:

Pursuant to General Order 96-B, General Rule 7.4.3, NGA911 (“NGA”) (U 7347 C) hereby submits its reply to protests of Advice Letter 20 (“AL 20”). The purpose of AL 20 is to inform the Commission of NGA911’s involuntary discontinuance of service and the resulting negative impact on public safety.

I. Background

On August 20, 2025, NGA submitted AL 20 to obtain approval from the California Public Utilities Commission (“CPUC”) and to ensure that the CPUC was fully informed about NGA911’s involuntary discontinuance of service and the resulting negative impact on public safety. Cal OES notified NGA on June 2025 that Cal OES intends to dismantle the Regional NG911 networks deployed by four regional carriers (including NGA911) and transition to a Single Statewide NG911 provider. Because Cal OES required, and the Commission directed, that NG911 service be provided via tariff, the dismantling and

ultimate discontinuance of the NG911 service requires prior notice to, and approval from, the Commission.

II. SUMMARY AND NGA911 RESPONSE TO PROTESTS

Seven parties submitted protests and responses to Advice Letter 20: Sutter Yuba Taxpayer Association, Central Valley Taxpayers Association, Contra Costa Taxpayers Association, Public Safety Answering Points (“PSAP”), Koorsoh Rad, Central Valley Taxpayers Association (“CVTA”), Central Coast Taxpayers Association (CCTA) and the Cal OES. NGA911 hereby responds to the protests.

A. PUBLIC SAFETY ANSWERING POINTS PROTEST

1. Protest Summary

Roya E. Dardashti, a medical doctor, protested NGA911’s Advice Letter 20 raising numerous concerns about the effect of CalOES’ plan to dismantle the NG911 network on which medical professionals such as herself are depending to ensure that Californians experiencing a medical emergency can get the help they need. Dr. Dardashti gave a blunt assessment of the harms she anticipates if NGA911 and the other three regional carriers are forced to withdraw NG911 service. She characterized CalOES’ plan to dismantle the NG911 network as “a rollback of California’s public safety resiliency” that “will put lives at risk.”

Dr. Dardashti summarized the primary flaws in the CalOES plan as follows:

- removes reliability through redundancy;
- sidelines hundreds of PSAPs;
- places lives at risk, especially in our most populous regions;
- void of procurement timelines and safety guarantees.

Dr. Dardashti expressed concerns that CalOES has directed carriers to dismantle the NG911 network, but has not provided definitive timelines, offered little detail, and failed to address how most of California’s public safety answering points (PSAPs) will be supported

moving forward. Dr. Dardashti expressed deep concern that CalOES' precipitous decision to dismantle the NG911 network (already underway) "weakens, rather than strengthens, the state's 911 system" and does not address the critical vulnerabilities facing the more than 400 PSAPs that still rely on aging legacy infrastructure. She notes that Phase II of CalOES' plan to discontinue the existing NG911 network, expected to begin during the first quarter of 2026, will focus on California's 911 centers near the 23 PSAPs that have already migrated to the NG911 network, and therefore dismantling the NG 911 network will reduce redundancy, spreading fragility across the state.

Dr. Dardashti stated that Phase III, projected to begin in October 2026, aims to migrate the remaining 400+ PSAPs onto a single, centralized network while a secondary system remains only conceptual. This approach concentrates all 911 traffic through one vendor, greatly increasing the potential for widespread failure. Dr. Dardashti noted that instead of phasing out the legacy system in a controlled, risk-aware manner, CalOES is extending its use and further entrenching dependence on an already fragile architecture.

2. NGA911 Response

PSAPs are the answering centers responsible for receiving emergency calls and coordinating the dispatch of appropriate emergency services like police, fire, and/or emergency medical services. Because PSAPs are on the front lines of handling emergency 911 calls, their concerns about the CalOES plan to dismantle the NG911 service should be given substantial weight. NGA911 shares Dr. Dardashti's concerns that CalOES is proceeding with the dismantling of the four regional NG911 networks without sufficient planning or safeguards in place to ensure that the 911 system will continue to function as a pivotal resource protecting the health and safety of Californians.

NGA911 received informal notice from CalOES and formal notice from CPUC staff today that Advice Letter 20 is suspended to give staff additional time to consider the public health and safety considerations of NGA911's involuntary withdrawal of its NG911 service and tariff pursuant to the CalOES shift in direction for the state's emergency network. NGA911 stands ready to address Dr. Dardashti's concerns and to answer questions from staff that will assist in their assessment of Advice Letter 20.

B. TAXPAYER GROUP PROTESTS

1. Taxpayer Group Protests:

Five county-wide taxpayer groups filed protests of Advice Letter 20.¹ These taxpayer groups raised similar concerns about the waste of taxpayer dollars from the dismantling of the NG911 network that NGA911 built over the past five years for CalOES. The groups indicated that dismantling the network will waste hundreds of millions of taxpayer dollars.² SYTA noted that \$500 million has already been spent on regional NG911 infrastructure and that an additional \$60 million will be wasted by CalOES while it continues to run the outdated legacy 911 system as it transitions to a new single NG911 vendor statewide.³

The taxpayer groups also expressed concerns about public safety if NGA911 and other regional NG911 providers are required to dismantle the existing network and withdraw their NG911 service. They noted that NG911's regional design was built to prevent outages and provide seamless failover between vendors and that the decommissioning will eliminate that redundancy, forcing continued reliance on the failing legacy network. In particular, the Sutter Yuba Taxpayers Association ("SYTA") noted that Sutter and Yuba counties include

¹ Sutter Yuba Taxpayer Association, Central Valley Taxpayers Association, Contra Costa Taxpayers Association, and Central Coast Taxpayers Association.

² SYTA, CVTA, CoCoTA, CCTA.

³ SYTA, CVTA.

rural areas where residents already face longer emergency response times and limited local responses. SYTA further noted that removing NG911 will reverse the gains of failure fixes through real-time monitoring and advanced location services and endanger rural Californians. Similarly, the group stated that its membership covers the Central Valley of California, one of California's most rural and underserved regions. CVTA also notes that NG911 in the Central Valley is already fully constructed, tested, and operational and state and local taxpayer funds that have been invested in building the network will be wasted if the system is dismantled and replaced. CVTA reiterates the financial consequences, as stated by SYTA, of dismantling the existing NG911 regional network as well as stating that the state has signaled its intent to work with Atos, a French IT services company. CVTA also points out that to dismantle the NG911 will reduce public safety and increase outage risks.

The Contra Costa Taxpayers Association (“CoCoTax”) stated that dismantling the existing NG911 network will reduce service quality by eliminating the redundancy that the NG911 regional design was built to provide, thereby forcing continued reliance on the outdated legacy network, which Cal OES data shows suffers an average of 263 outage hours per month. CoCo Tax points out that removing NG911 service will roll back gains in accuracy, outage prevention, and response time, leaving both rural residents and dense population centers more vulnerable in emergencies.

CVTA states that CalOES is still working on a request for proposal (“RFP”) a plan to dismantle the NG911 network, and that the RFP will be the first small step in what will be “a prolonged and difficult process.” CVTA notes that the complex undertaking will strand the larger and more complex PSAPs, including Los Angeles—which serves nearly 17 million residents—on the “failing legacy 911 system” until 2030 under the CalOES schedule.

The Central Coast Taxpayers Association (CCTA) stated that dismantling the NG911 system and consolidating the four regional systems under a single architecture undermines public safety and reduces the resilience of the 911 network that residents rely on in emergencies. CCTA notes that the four-region design was intentionally created to avoid any single statewide point of failure and to allow seamless failover between vendors in the event of a disruption. The proposed single-vendor approach eliminates that redundancy and keeps the outdated, failure-prone legacy network in place for at least five years. CCTA also states that the reversal directly contradicts the 2018 Business Continuity Plan, created after the Paradise Fire, which prioritized regional redundancy to ensure uninterrupted emergency service during disasters.

2. NGA911 Response

California taxpayers have already invested more than \$500 million to build and deploy a modern, resilient NG911 system that is fully constructed, tested, and ready to serve. Dismantling that system now and reverting to an outdated, failure-prone legacy network is not just wasteful, it is fiscally irresponsible. Cal OES's decision would force taxpayers to foot the bill twice: continuing to spend \$60 million per year to keep the legacy system on life support, and then hundreds of millions more to rebuild a single-vendor model that strips away redundancy and reliability.

This reversal effectively discards a network that Californians have already paid for and places residents, especially in rural and underserved areas, at greater risk during emergencies. Taxpayer groups from across the state have rightly called this a betrayal of both public trust and fiscal responsibility. *Their message is simple: taxpayers **should not be required to pay again for something we've already built.***

C. CALOES PROTEST

In its protest to Advice Letter 20, CalOES confirmed its plan to dismantle the NG911 system, but somewhat confusingly asserts that the Commission should play no role in reviewing and approving the tariff modifications and eventual withdrawal of NGA911's tariff necessitated by its plan. CalOES further raises purported procedural issues with Advice Letter 20 and claims that NGA911 is incorrect about the technical changes CalOES is carrying out and the resulting risk to public safety.

CalOES asserts that its protest is based on General Order 96-B, section 7.4.2, which sets forth narrow grounds for protests. Specifically, CalOES' protest attacks NGA911's advice letter on three of the grounds set forth in Section 7.4.2 (lack of statutory authorization for requested relief, purported service issues, and purported material errors of fact). Thereafter, the protest veers off on a wide-ranging and unsupported set of claims about lack of Commission jurisdiction over tariff changes for NG911 service and NGA911's purported motive for submitting Advice Letter 20 notifying the Commission of the need to modify and eventually withdraw its NG911 tariff and other assorted technical claims. NGA911 responds to CalOES' protest below.

1. Response to Claim that the Commission lacks jurisdiction over tariff review

CalOES claims that Advice Letter 20 "fails to identify the statute or Commission Order that allows CPUC to consider this advice letter."⁴ The Commission's jurisdiction over tariff matters, however, is long-standing and beyond question. The California Constitution authorizes the Commission to "fix rates," which directly relates to tariff

⁴ CalOES protest, at p. 2.

regulation, as tariffs are schedules of rates, terms and conditions.⁵ California courts have upheld the Commission's jurisdiction over tariffs. For example, in *Nader v. Allegheny Airlines*, the California Supreme Court noted the long line of cases in which the Commission has been found to have primary jurisdiction "when an action otherwise within the jurisdiction of the court raises a question of the validity of a rate or practice included in a tariff filed with an agency."⁶

CalOES' protest challenging the Commission's authority to oversee NG911 tariffs is especially odd given the history of these tariffs. As noted in Advice Letter 20, CalOES required winning bidders to provide NG911 service via tariff⁷ and the Commission directed carriers to tariff their NG911 services.⁸ CalOES did not protest NGA911's Advice Letter 14 amending its tariff to add NG911 service. But CalOES now assaults the Commission's jurisdiction over tariffs because it now wishes to make unilateral decisions to dismantle the NG911 network and corresponding NG911 services.

Because NG911 service is offered via tariff, NGA911 submitted Advice Letter 20 to provide the required notice prior to material modifications or withdrawal of its NG911 service. While NGA911 does not have a definitive date on which CalOES will require all steps of the dismantling process, NGA911 decided to proceed to provide the required notice given the extreme importance of the public safety issues raised by CalOES' plan. NGA911 is surprised by CalOES' disrespectful tone toward the Commission and its authority over

⁵ Cal. Constit., Art. XII §6; *City and County of San Francisco v. Uber Technologies, Inc.*, 36 Cal. App. 5th 66.

⁶ *Nader v. Allegheny Airlines* (1976) 426 U.S. 290, 304 (citing, e.g., *Danna v. Air France* (1972), 463 F. 2d 407; *Southwestern Sugar & Molasses Co. v. River Terminals Corp.* (1959), 360 U.S. 411, 417-418; *United States v. Western Pacific R. Co.* (1956) 352 U.S. 59, 66-67).

⁷ Statement of Work between CalOES and NGA911, at p. 4 ("All Region NG9-1-1 services shall be purchased off of Tariffs.") (August 20, 2019).

⁸ NGA911 Advice Letter 20, at p. 1.

tariffs since CalOES itself insisted that NG911 contracts be codified as tariffs.

Far from asking the Commission to “interfere” with CalOES’ administration of the NG911 network,⁹ or to “run afoul” of the Warren 9-1-1 Act,¹⁰ Advice Letter 20 merely notifies the Commission of anticipated material changes and eventual withdrawal of the very tariff that CalOES insisted the winning carriers for the NG911 network submit. CalOES’ actions placed the Commission squarely in the administration of the NG911 network.¹¹ If CalOES truly believed that the Commission’s oversight of NG911 tariffs would violate the Warren 911 Act, presumably it would not have insisted that winning carriers tariff the rates, terms and conditions of their contracts as a tariff.

CalOES seems to misunderstand the purpose of advice letters generally and misreads NGA911’s advice letter 20 in at least two material ways. First, CalOES claims that NGA “plainly overreaches by asking CPUC to substitute its judgment for that of the agency charged by the Legislature with determining the most effective model for 911 services”. NGA911 did not ask the Commission to do anything other than play its lawful role in reviewing and deciding whether to approve material changes, and the ultimate withdrawal, of its tariff. The Commission certainly has a right to know the potential risks to public safety arising from such tariff changes.

Second, CalOES claims that NGA911 is asking that it “be allowed to unilaterally determine when to decommission NG911 circuits.”¹² This is completely false. NGA911 is asking *the Commission* to determine the timing and effect of decommissioning the NG911 network that CalOES confirms it is undertaking. CalOES will ultimately determine when or

⁹ CalOES protest, at p. 2.

¹⁰ CalOES protest, at p. 3.

¹¹ See CalOES Statement of Work.

¹² CalOES protest, at p. 3.

if the NG911 network and associated services are dismantled, but the Commission must review such changes in advance.

2. Response to claim of alleged Procedural Issues in Advice Letter 20

CalOES claims that NGA911's Advice Letter 20 has several procedure defects, but its claims are incorrect. First, CalOES claims that the Advice Letter was not "properly served" on CalOES.¹³ CalOES appears to have confused the draft customer notice included with Advice Letter 20 with the general requirement to service advice letters. If Advice Letter 20 is approved, NGA911 will send the approved customer notice to CalOES, thus it is premature for NGA911 to provide the customer notice.

On the other hand, advice letters are served on a wide variety of interested persons who sign up for one or all of the advice letter service lists maintained by the Commission.¹⁴ General Order 96-B, Industry Rule 10-2 states in relevant part, "[t]he Commission will host service lists on the Commission's public web site by means of which persons or entities can request to be served with particular categories of advice letters filed by all Telecommunication Carriers."¹⁵ NGA911 served Advice Letter 20 on the service list for advice letters not fitting any other specific category. Apparently CalOES neglected to sign up for service of advice letters despite having directed winning carriers to tariff their NG911 services. NGA911 was not obligated to add CalOES to the service list. In any event, CalOES obviously obtained a copy of Advice Letter 20 since it filed a protest. NGA911 notes that CalOES did not request a copy of Advice Letter 20, as it could have done under the GO-96 rules.

¹³ CalOES protest, at p. 11-13.

¹⁴ General Order 96-B, Industry Rule 10-2

¹⁵ *Id.*

Second, CalOES makes contrary claims that Advice Letter 20 is not really an advice letter¹⁶ but then also claims that NGA911 did not submit it in the correct advice letter category.¹⁷ Advice Letter 20 falls squarely within the types of advice letters appropriate for Tier 1, namely “A change by an URF Carrier to a rate, charge, term, or condition of a retail service (except for ILEC Basic Service rates). Changes to terms and conditions for Basic Service that do not conflict with law or the Commission’s decisions or orders are permitted.”¹⁸ Tier 1 advice letters take effect on one day’s notice. NGA911 anticipated that staff would need more than a single day to consider the public safety implications of Advice Letter 20, and voluntarily submitted it in Tier 2, which the rules explicitly allow. Tier 2 advice letters include “[a]n advice letter otherwise appropriate to Tier 1 but for which the Utility submitting the advice letter requests review and disposition under Tier 2.”¹⁹

Furthermore, NGA911 stated explicitly in Advice Letter 20 that the notification about CalOES’ dismantling of the NG911 network and services appeared to fit best in Tier 2, but that it stood ready to file an application if Commission staff directed it to do so.²⁰ In any event, if staff disagrees with the tier in which NGA911 submitted the advice letter, the remedy is to direct NGA911 to use a different Tier or to file an application, not to reject the Advice Letter “with prejudice” as CalOES urges.²¹ CalOES appears to be attempting to block NGA911 from re-submitting an advice letter notifying the Commission about the CalOES decommissioning of the NG911 network components and services provided pursuant to tariff. NGA911 is unaware of any mechanism through which a protestor has

¹⁶ CalOES protest, at p. 7, 11.

¹⁷ CalOES protest, at p. 10.

¹⁸ General Order 96-B, Telecommunications Rule 7.1(5).

¹⁹ General Order 96-B, Telecommunications Rule 7.2.

²⁰ NGA911 Advice Letter 20, at p.6

²¹ CalOES protest, at p. 11.

ever been allowed to prevent a carrier from correcting or amending an advice letter or to re-submit an advice letter in a different tier.

Third, CalOES claims that NGA911's Advice Letter 20 is "unclear"²² and "unreasonable."²³ Neither of these assertions is correct, and they also are not valid grounds for protesting an advice letter. CalOES claims that Advice Letter 20 "may be interpreted as asking to withdraw NGA's support for NG 911 services altogether."²⁴ CalOES' confusion appears to be an unfamiliarity with the advice letter process. NGA911 is not asking to withdraw support for NG911 services altogether. Quite the contrary, NGA911 is concerned that it is being directed by CalOES to take steps to dismantle the NG911 network it deployed over the past five years and that such dismantling will inevitably lead to discontinuance of NG911 services. To be clear, NGA911 stands ready to continue providing NG911 service pursuant to its tariff unless or until CalOES cancels the services *and* the Commission approves NGA911's tariff withdrawal reflecting that cancellation.

Further CalOES misunderstands the purpose of the PAL cover sheet. NGA911 included the requested effective date of September 29, 2025 thirty days after Advice Letter 20 was filed, as required by General Order 96-B. Such effective date simply means the Commission has 30 days to consider the contents of an advice letter and determine whether to approve it. If the Commission does not approve Advice Letter 20, NGA911 will continue providing NG911 service at the rates, terms and conditions set forth in its tariff. Moreover, any protest (such as the one submitted by CalOES) typically triggers a suspension of the advice letter. Now that Advice Letter 20 has been suspended by Commission staff,

²² CalOES protest, at p. 8.

²³ CalOES protest, at p. 11.

²⁴ CalOES protest, at p. 11.

NGA911 will continue to provide NG911 services pursuant to the rates, terms and conditions of its NG911 tariff. Advice Letter 20 is apparently suspended for 120 days, thus NGA911 clearly will be continuing to provide NG911 service during that period and beyond.

3. Response to alleged technical and data errors in Advice Letter 20

CalOES claims there are inaccurate statements in Advice Letter 20 regarding the public safety risks associated with dismantling the NG911 network.²⁵ The filing correctly identified the public safety risks of dismantling a redundant, regionally designed system in favor of a single-vendor approach that prolongs reliance on the failing legacy network. If staff sought clarifications, the proper remedy would be to request amendments, not to deny the filing “with prejudice.” Both premature and unwarranted. NGA911 stands by its filing and by its commitment to taxpayers and public safety. NGA911 explains below why the identified statements are not inaccurate, but even if clarifications were needed, the correct procedure is for staff to request amendments to Advice Letter 20, not a denial “with prejudice” as CalOES urges.²⁶

a. Number of PSAPs receiving voice traffic from NGA911

CalOES asserts that NGA911 reported that 13 PSAPs currently receive 911 voice traffic from NGA911, but the correct number is 14.²⁷

NGA911 Response: The number PSAPs receiving NG911 from NGA 911 does not have a material effect on the concerns that NGA 911 raised in Advice letter 20.

b. Reason CalOES placed a “project hold” on NG911

²⁵ CalOES protest, at p. 4.

²⁶ CalOES protest, at p. 7.

²⁷ CalOES protest, at p. 4.

CalOES asserts that it has placed the NG911 project “on hold” to evaluate unidentified “complexities” arising from having multiple regional NG911 providers and to better understand PSAPs’ “user experience” that has slowed migration to the NG911 network²⁸

NGA911 Response: CalOES appears to be re-characterizing its notice that it intended to dismantle the NG911 networks as a “hold.”

The regional NG911 networks are not hypothetical or incomplete; they are already constructed, tested, and carrying live 911 traffic without the widespread outages that plague the legacy system. CalOES has not cited a single factual operational failure to justify halting migration.

In fact, the record shows that the regional design has improved accuracy, reliability, and resiliency for the PSAPs it serves. Calling this a “hold” obscures the fact that CalOES is actively moving to replace a functioning, taxpayer-funded system with an unproven single-vendor model that eliminates redundancy and extends dependence on the legacy network for years to come.

c. **Service quality issues arising from continued user of legacy 911 network**

CalOES takes issue with NGA911’s statement in Advice Letter 20 that if the NG911 network is dismantled, Californians will necessarily have to continue relying on the outage-prone and less feature rich legacy 911 network.²⁹ It claims that the NG911 network is configured with a statewide prime vendor, which purportedly has “three layers of redundancy”.³⁰ CalOES states that its plan is to dismantle the four-region NG911 network

²⁸ CalOES protest, at p. 4.

²⁹ CalOES protest, at p. 5.

³⁰ *Id.*

but replace it with a second statewide provider.

NGA Response: CalOES does not address the lack of redundancy during the period of contract award, planning and installation for a second statewide provider. Dismantling the regional NG911 networks forces Californians back onto the outage-prone legacy system for years while a new statewide system is procured and built. Even if a second statewide vendor is eventually added, that does not address the immediate gap in redundancy during transition. Further, “three layers of redundancy” within a single vendor is not equivalent to the vendor diversity and failover built into the four-region model. The regional design was intentional; *to prevent a single statewide point of failure.* The regional NG911 system already delivers superior features like accurate caller location, text and video capabilities, and real-time monitoring. Dismantling it in favor of an uncertain statewide buildout reduces service quality and puts Californians at greater risk.

Cal OES claim that the only statewide network is the prime Network is a false claim. The state has a network of four regions that traverse the entire state. Additionally, these four regions have diversification across providers giving additional resilience and redundancy to the network.

The regional approach is consistent with efforts in other large states across the US.

d. **Delay and increased outages during transition to statewide provider**

CalOES claims that the existing statewide provider network is already built and that somehow this network will ameliorate concerns about outages and poor network performance during the dismantling of the regional NG911 networks. CalOES also claims that moving to a statewide provider will in some unspecified way reduce complexities.

NGA911 Response: See response above for 3.c _

e. **Loss of redundancy due to move to statewide provider**

CalOES claims there are “six layers of redundancy in the current NG911 design and that NGA911 provides three of those layers. Therefore, CalOES claims there will not be a complete loss of redundancy during the dismantling of the NG911 network and conversion to a new statewide provider.”³¹

NGA Response: See response above for 3.c

f. **Increased reliance on antiquated legacy 911 system**

CalOES asserts that NG911 systems have unspecified “unanticipated complexities” and as a result it has put a hold on the project. CalOES claims that this “hold” will not result in an increased reliance on the legacy 911 system.

NGA Response: CalOES fails to provide any details and instead makes a blanket assertion that putting a “hold” on the NG911 network will not result in increased reliance on the antiquated 911 system. It is reasonable to conclude, however, that any delay in completing the NG911 system necessarily prolongs the use of the legacy 911 system.

The fact is simple: every day the NG911 migration is delayed keeps Californians dependent on a legacy system that is outage-prone, lacks modern features, and costs taxpayers millions each year to maintain. Calling it a “hold” does not change the reality that delaying completion of NG911 means prolonging reliance on the very system the state has already determined must be replaced.

³¹ CalOES protest, at p. 6.

III. CONCLUSION

The purpose of CalOES' request that the Commission reject Advice Letter 20 is perplexing. CalOES acknowledges that it has put a "hold" and is planning to replace the four regional NG911 networks with a statewide provider. Because NGA911 was required to tariff its NG911 service, it must notify and obtain approval from the Commission for any material changes or withdrawal of its NG911 service. CalOES' primary issue, then, appears to be the timing of NGA911's advice letter, and not the need for NGA911 to inform the Commission that CalOES intends to dismantle the existing NG911 network. NGA911 followed the requirements of GO 96-B by providing advance notice that its tariffed NG911 service is being discontinued by CalOES.

Sincerely,

/s/ Anita Taff-Rice
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