



iFoster Inc.
PO Box 159
Truckee, CA 96160

February 28, 2023

Via email: CALLAdviceLetter@cpuc.ca.gov
Mr. Robert Osborn
Director, Communications Division
505 Van Ness Avenue, Third Floor
San Francisco, CA 94102

Re: iFoster Inc. Advice Letter 1-A regarding Expenditures and Budget of Program

Dear Mr. Osborn:

Pursuant to Section 7.5.1 of General Order 96-B, iFoster Inc. (“iFoster”) hereby submits this Supplemental Advice Letter No. (“AL”) 1-A. The original iFoster AL 1 was filed on February 13, 2023, with a requested effective date of February 1, 2023.

The purpose of this supplemental filing is to provide further information on the February 2023 through July 2024 program budget for the extension of the California LifeLine Foster Youth Pilot Program as ordered under Commission Decision (“D.”) 23-01-003, dated January 12, 2023 (“Extension Decision”). It is being provided at the request of the Communication Division staff. The purpose of this supplemental information is to provide additional information about the pilot program expenditures and budget, only as to the extension period. IFoster notes that no change in the pilot program service offering to participants is being made. Further, this pilot program does not charge pilot participants, therefore, a notice to customers is not required.

In compliance with G.O. 96-B, we hereby serve a copy of this AL 1-A via email upon the parties identified on the attached CPUC Advice Letter Service List for “Any Advice Letter not fitting within the preceding categories” and the service list for Rulemaking No. 20-02-008 as of on February 28, 2023. If there are any questions regarding this advice letter, please call (916) 894-5768.

Anyone may protest or respond to AL 1 which was filed on February 13, 2023, by sending a written protest or response via email to harjeet.kumar@cpuc.ca.gov and maria.valadez@cpuc.ca.gov at the



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Commission's Communications Division. If submitting a protest, the protest must set forth the specific grounds on which it is based, including supporting information or legal arguments. A protest or response to the advice letter must be submitted to the Communications Division within 20 days of the date the advice letter was filed and served on iFoster Inc. on the same day.

Notices should be sent to:

Serita Cox
CEO, iFoster Inc.
PO Box 159
Truckee, CA 96160
Via email: serita@ifoster.org

To obtain information about the CPUC's procedures for advice letters and protests, visit the CPUC's website at www.cpuc.ca.gov and look for the links to General Order 96-B.

Sincerely,

A handwritten signature in black ink, appearing to read "Serita Cox", is placed over a light-colored rectangular background.

Serita Cox
CEO, iFoster Inc.

Attachment: Attachment A

cc: Service lists: Any Advice Letter not fitting within the proceeding categories and R.20-02-008
Harjeet Kumar (via email harjeet.kumar@cpuc.ca.gov)
Maria Valadez (via email maria.valadez@cpuc.ca.gov)
Nicholas Clark (via email nicholas.clark@cpuc.ca.gov)
Chari Worster (via email chari.worster@cpuc.ca.gov)

iFoster AL 1-A, Attachment A

I. INTRODUCTION

Pursuant to the Commission Decision (“D.”) 23-01-003, dated January 12, 2023 (the “Extension Decision”), iFoster submits the following Supplemental Advice Letter 1-A. The original iFoster Advice Letter (“AL”) 1 was sent to the Director of the Communications Division on February 13, 2023, and served on the service lists required by the Extension Decision.

As noted in the original AL 1 filing, the budget provided therein for the second extension of the CPUC LifeLine Phones for Foster Youth Pilot Program (“Program”) is an accurate reflection of the full cost of the Program. The previous extension budget for the prior program time period of July 16, 2020 to January 31, 2023, was highly subsidized by \$1,572,475 in funding from the California Governor’s March 4, 2020 Proclamation of a State of Emergency and his subsequent Executive Order N-33-20 (“Executive Order”) which took effect April 24, 2020 and extended until April 22, 2022 directing iFoster to ensure that all foster youth ages 5 to 26 had the technology they needed for distance learning, child welfare and court mandated visitations and telehealth during the COVID-19 pandemic. The Program budget also did not reflect the cost of the hardware nor the monthly service plan. Further, the AL1 budget filed on February 13, 2023 reflects:

- (1) an increase in the Administrator role to include validating and approving carrier reports of participant enrollment, terminations, and utilization, as well as carrier invoices;
- (2) increase in personnel costs due to wage increases over time; and
- (3) forecast of hardware and service plan expenditures, including the addition of charging blocks and cases to reduce replacement requests.

This supplemental AL 1-A provides a more detailed accounting of the budget previously provided in AL 1, and an explanation of the differences between Extension 1 Budget (July 16, 2020 to January 31, 2023) and Extension 2 Budget (February 1, 2023 to July 31, 2024).

II. EXTENSION 2 BUDGET FOR FEBRUARY 2023 TO JULY 2024

As required in D.23-01-003, in AL 1, iFoster put forth the budget in Table 1 documented by quarter. The first quarter of this budget includes February and March 2023 only. The last quarter of this budget includes July 2024 only. A detailed breakdown of the budget is attached herein along with a budget narrative (see section III).

Table 1 Budget for 18 Month Extension, February 2023 through July 2024 (Extension 2 Budget)

Quarterly Summary	2023				2024		
	Q1 (Feb/Mar)	Q2	Q3	Q4	Q1	Q2	Q3 (Jul)
Pilot Extension Expenditure Categories							
Marketing and Outreach	\$ 38,000.31	\$ 57,000.46	\$ 57,000.46	\$ 57,000.46	\$ 57,000.46	\$ 57,000.46	\$ 19,000.15
Administration	\$ 148,180.00	\$ 172,270.00	\$ 72,270.00	\$ 72,270.00	\$ 72,270.00	\$ 72,270.00	\$ 24,090.00
Participant Phone Audit and Fiscal Control	\$ 21,293.11	\$ 31,939.66	\$ 31,939.66	\$ 31,939.66	\$ 31,939.66	\$ 31,939.66	\$ 10,646.55
Hardware	\$ 72,000.00	\$ 117,000.00	\$ 117,000.00	\$ 112,500.00	\$ 108,000.00	\$ 102,000.00	\$ 33,000.00
Service Plan	\$ 546,708.00	\$ 948,387.00	\$ 1,096,287.00	\$ 1,231,137.00	\$ 1,352,937.00	\$ 1,461,687.00	\$ 507,529.00
TOTAL	\$ 826,181.42	\$ 1,326,597.12	\$ 1,374,497.12	\$ 1,504,847.12	\$ 1,622,147.12	\$ 1,724,897.12	\$ 594,265.71

III. COMPARISON OF EXTENSION 1 and 2 BUDGETS

Table 2 provides a side-by-side comparison of the Program budget for Extension 1 (July 16, 2020 to January 31, 2023) and Extension 2 (February 1, 2023 to July 31, 2024).

- The Extension 1 budget did not include the roles of Marketing and Outreach, Participant Phone Audit and Fiscal Control, or the forecasted cost of Hardware and Monthly Service Plan.
- During the Extension 1 time period, iFoster was operating under funding provided by the Governor’s Executive Order, iFoster was allocated a budget of \$1,572,475.00 to ensure that children in foster care ages 5 to 20 inclusive, and those who had aged out and were attending college (ages 21 to 26 inclusive) had the technology (smartphone, hotspot, laptop, and/or tablet) that they needed for distance learning, child welfare and court-mandated visitations, and telehealth. This budget provided for (1) marketing and outreach, (2) monthly participant reporting and fiscal control including the management of requests across California Department of Social Services, California Department of Education and California Public Utilities Commission projects to support this Executive Order, (3) the distribution of donated technology not included in the CPUC LifeLine Phones for Foster Youth Pilot, and (4) the purchase of refurbished technology as needed to fill any gaps. As a result, iFoster only sought a budget to cover the Administration of the CPUC Program. This included: (1) application review, (2) eligibility validation, (3) ordering from the service provider, T-Mobile, (4) shipping notification and management, (5) managing participation on both T-Mobile and Boost Mobile networks, (6) and the swap from service provider Boost Mobile to service provider T-Mobile . This ensured that since there was a 100% overlap between the eligible population for the CPUC LifeLine pilot and the Governor’s Executive Order, there was no “double dipping” in terms of expenses.

Table 2 Comparison of Extension 1 and Extension 2 Budgets

Quarterly Summary	Comparison		
Pilot Extension Expenditure Categories	Extension 1	Extension 2	Increase
Marketing and Outreach	\$ -	\$ 342,002.77	
Administration	\$551,234.19	\$ 633,620.00	15%
Participant Phone Audit and Fiscal Control	\$ -	\$ 191,637.97	
Hardware	\$ -	\$ 661,500.00	
Service Plan	\$ -	\$7,144,672.00	
TOTAL	\$551,234.19	\$8,973,432.74	

To elucidate Table 2 above, **Marketing and Outreach** activities mirror the activities undertaken and associated expenses under the Governor’s Executive Order including leveraging iFoster’s other programming including our robust internship program of peer resource navigators. This includes bi-weekly workshops for transition-age foster youth (TAY) serving agencies and TAY hosted by our peer resource navigators and funded by our internship programming. Only expenses not already covered under the internship program will be charged to the CPUC Program , subsidizing CPUC funding. Expenses are forecasted to be incurred for attending in-person resource fairs and convenings hosted by our over 700 agency partners in the state, which while forecasted as consistent month-to-month in the budget will actually vary in timing, based on the scheduling of our partners. iFoster will also leverage our existing marketing/outreach platforms (Constant Contact, monthly newsletter, Twilio) and pro-rate expenses based on allocating costs by resource programs covered during these outreach activities.

Administration is expected to rise by 15% to accommodate the new roles and responsibilities iFoster will be taking on in the Extension 2 Program. iFoster will have a contract directly with T-Mobile for carrier services, and as such, iFoster will be responsible for validating and approving all carrier expenditures for this pilot on a monthly basis. This contract is an extension of iFoster’s existing National Contract with T-Mobile for carrier services. This additional role will include both an increase in iFoster’s administrative duties, as well as the expansion of iFoster’s CRM systems to effectively manage matching the usage, hardware, and participant data from T-Mobile to individual named, and the eligible participants in iFoster’s systems on a monthly basis. iFoster began undertaking this role in October, 2022 with assistance from T-Mobile. iFoster and T-Mobile have developed a plan for managing direct feeds of participant usage and billing data from T-Mobile through its portal starting in February, 2023.

Participant Phone Audit and Fiscal Control will now also become an expenditure of the Extension 2 Pilot Program. With the end of the funding from the Governor’s Executive Order, iFoster has again decoupled its technology programming such that this pilot is ring-fenced as its own auditable unit. Under single federal

audit rules, iFoster has increased its fiscal and auditing controls for this pilot, in addition to putting in place the necessary monthly audit reviews to match T-Mobile participant data with iFoster participant data and validation of T-Mobile billing.

As to **Hardware**, the Extension 2 program budget provides a forecast of participants by month, driving a forecast model for hardware and monthly service billing. Due to the end-of-life cycle of the pilot's current phone model, iFoster will move from the T-Mobile Revvl 4 (Motorola G6 model) to the T-Mobile Revvl 6 (Motorola G7 model) for the Extension 2 Program. The new phone pricing has been negotiated as part of iFoster's National Contract and is only charged for replacements (i.e. no charge device charge for new participant). However, this new phone, like the majority of new devices, does not come with a wall charging block. iFoster will bulk purchase these charging blocks, as well as hard cases and screen protectors to better protect these phones. T-Mobile will add the charging blocks and cases with protective screens as part of their kitting process at no extra charge, per iFoster's National Contract. For budgeting purposes, iFoster has forecasted that each replacement phone will need to be paired with a charging block and case with protective screen. This is an over-forecast as for some replacements involving these new phones; the youth participant will still have a usable charging block and case.

NOTE: Analysis of incident reports from youth who had broken, lost or had their phone stolen shows that 60% of reports were for broken devices. It is estimated that at least half of these breaks could have been avoided with a case and protective screen been provided. Expenditure analysis shows that an upfront cost of providing a case will decrease replacement costs and therefore pilot hardware costs overall.

As to the **Service Plan**, under its National Contract, iFoster has negotiated a monthly service plan of \$29 inclusive of fees and taxes for unlimited voice, text, and data with no data overages. There is provided 11 GB of high speed hotspot data with unlimited max 3G hotspot speeds thereafter. In addition there is unlimited domestic data roaming and unlimited video streaming at SD quality. This offering is a superior service offering than traditional LifeLine at \$27.15 monthly and provides the Internet access participants need on their phone and across other devices (i.e. laptop, tablet) for school work (i.e. Internet research for homework, sharing homework with teachers/professors), online court mandated and child welfare visitations, and telehealth, in particular regular mental health therapy sessions. It is also a cheaper and more robust offering than the upgraded LifeLine of \$31.55 that some carriers offer with 8 GB of data.

IV. EXTENSION 2 BUDGET NARRATIVE

Tables 3 and 4 show the detailed budget forecasts for Marketing/Administrator/Control activities and Contracted Carrier Services. Of note, for budgeting purposes Marketing/Administrator/Control expenses are straight-lined across all months even though it is anticipated that the month to month actuals may vary. By quarter, it is anticipated that budget and expense will align. The Contracted Carrier Services are budgeted based on forecasted new enrollments and terminations by month. These too are expected to vary between forecast and actual on a monthly basis, but that quarterly and overall forecasts and actuals should align.

Marketing/Administrator/Control Budget

- Personnel and Non-Personnel expenses are color-coded to align with key activities of Marketing, Administrator and Control
- Personnel roles are defined in the budget
- Benefits include for all personnel listed by key activity: 403b plan, healthcare, workmen's compensation
- Non-Personnel expenses are pro-rated based on percent of use system, tools, materials, and activities by this pilot extension as iFoster leverages these across multiple programs
- iFoster uses ATT Office@Hand as our call center, phone system which bills on a per seat level (one seat per team member)
- iFoster uses Language Line for live translation services as many caregivers and some TAY are non-English speakers
- iFoster pays for dedicated Internet service for iFoster team members are part of our HIPAA compliant procedures and managing PHI data for LifeLine pilot candidates and participants
- iFoster's peer navigators will host bi-weekly standing workshops that potential candidates, current participants and agency partner front-line workers can opt into to learn about the LifeLine pilot and how to apply, as well as to have any of their questions answered
- As detailed in Section III, iFoster will participate in our partner agency events, resource fairs, etc. Budgeted as same monthly with the understanding that there will be monthly variability in actuals.
- iFoster uses Constant Contact system for newsletters and email notifications to allow for participants to opt-out of communications per the Federal Trade Commission
- iFoster uses Twilio for individual and group text notifications to pilot participants. Twilio only charges for group notifications as any group text needs to be reviewed and approved by Twilio and carriers prior to sending out

- As detailed in Section III, iFoster will need to build out its CRM system which houses all participant information to be able to pull in T-Mobile usage and participant data and match iFoster and T-Mobile data sets for monthly participant audits and billing reconciliation

Contracted Carrier Services Budget

- iFoster forecast on both new participant and termination (churn) per month
- As detailed in Section III, iFoster will bulk purchase wall block chargers and cases with protective screens. T-Mobile will add these during kitting for direct shipment to participants but will not charge extra for this service.
- As detailed in Section III, iFoster has negotiated a National Service Contract with T-Mobile which will include this pilot extension. The contract has negotiated free device and \$29 monthly service plan. The contract also has a cost not to exceed \$170 for a replacement phone.

TABLE 4 - IFOSTER LIFELINE PILOT EXTENSION BUDGET

Feb 1, 2023 to July 31, 2024

		EXTENSION PERIOD																			
		Embedded	JAN	FEB	MAR	APR	MAY	JUN	JULY	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JULY
Subscribers																					
New Subscribers				550	650	700	700	700	700	700	700	650	650	650	600	600	600	600	500	500	500
Churn (includes no longer eligible and non-usage)				50	100	100	100	100	150	150	150	150	150	150	150	150	150	150	150	150	150
Total Subscribers		8,301	8,301	8,801	9,351	9,951	10,551	11,151	11,701	12,251	12,801	13,301	13,801	14,301	14,751	15,201	15,651	16,101	16,451	16,801	17,151
Replacements																					
Replacement Phones		1,620		90	90	90	90	90	90	90	90	90	90	90	90	90	90	90	90	90	90
Hardware																					
	Unit Cost																				
New Phone	\$ -	TMO cost \$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
New Wall Charging Block	\$ 5.00	iFoster cost \$ -	\$ 2,750.00	\$ 3,250.00	\$ 3,500.00	\$ 3,500.00	\$ 3,500.00	\$ 3,500.00	\$ 3,500.00	\$ 3,500.00	\$ 3,500.00	\$ 3,250.00	\$ 3,250.00	\$ 3,250.00	\$ 3,000.00	\$ 3,000.00	\$ 3,000.00	\$ 3,000.00	\$ 2,500.00	\$ 2,500.00	\$ 2,500.00
New Phone Case	\$ 25.00	iFoster cost \$ -	\$ 13,750.00	\$ 16,250.00	\$ 17,500.00	\$ 17,500.00	\$ 17,500.00	\$ 17,500.00	\$ 17,500.00	\$ 17,500.00	\$ 17,500.00	\$ 16,250.00	\$ 16,250.00	\$ 16,250.00	\$ 15,000.00	\$ 15,000.00	\$ 15,000.00	\$ 15,000.00	\$ 12,500.00	\$ 12,500.00	\$ 12,500.00
Replacement Phone plus Accessories	\$ 200.00	TMO + iFoster cost \$	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00
Subtotal Equipment			\$ -	\$ 34,500.00	\$ 37,500.00	\$ 39,000.00	\$ 39,000.00	\$ 39,000.00	\$ 39,000.00	\$ 39,000.00	\$ 39,000.00	\$ 37,500.00	\$ 37,500.00	\$ 37,500.00	\$ 36,000.00	\$ 36,000.00	\$ 36,000.00	\$ 36,000.00	\$ 33,000.00	\$ 33,000.00	\$ 33,000.00
Service																					
	Unit Cost																				
Monthly Phone Service	\$ 29.00		\$ 255,229.00	\$ 271,179.00	\$ 288,579.00	\$ 305,979.00	\$ 323,379.00	\$ 339,329.00	\$ 355,279.00	\$ 371,229.00	\$ 385,729.00	\$ 400,229.00	\$ 414,729.00	\$ 427,779.00	\$ 440,829.00	\$ 453,879.00	\$ 466,929.00	\$ 477,079.00	\$ 487,229.00	\$ 497,379.00	\$ 497,379.00
Total Other			\$ -	\$ 255,229.00	\$ 271,179.00	\$ 288,579.00	\$ 305,979.00	\$ 323,379.00	\$ 339,329.00	\$ 355,279.00	\$ 371,229.00	\$ 385,729.00	\$ 400,229.00	\$ 414,729.00	\$ 427,779.00	\$ 440,829.00	\$ 453,879.00	\$ 466,929.00	\$ 477,079.00	\$ 487,229.00	\$ 497,379.00
TOTAL			\$ -	\$ 289,729.00	\$ 308,679.00	\$ 327,579.00	\$ 344,979.00	\$ 362,379.00	\$ 379,329.00	\$ 394,279.00	\$ 410,229.00	\$ 423,229.00	\$ 437,229.00	\$ 452,229.00	\$ 463,779.00	\$ 476,829.00	\$ 489,879.00	\$ 502,929.00	\$ 510,079.00	\$ 520,229.00	\$ 530,379.00

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Company	UNumber	Date Submitted
AT&T California	1001	2/24/2012
CCT Telecomm		3/1/2012
Comcast Phone of California, LLC	U-5698-C	3/1/2012
TNCI		3/5/2012
PPG COMMUNICATIONS		3/6/2012
CA - CLEC LLC & NewPath Networks, LLC	6936 & 6928	3/13/2012
Consolidated Communications, Inc	1015, 7261	3/26/2012
		4/2/2012
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Kelley Drye & Warren LLP		4/24/2012
Point to Point, Inc.	6066	5/1/2012
Davus Wright Tremaine		6/12/2012
Davus Wright Tremaine		6/12/2012
Point To Point Inc	6066	6/12/2012
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Nexus Communications	U-4387-C	9/17/2012
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Argus Media	N/A	2/26/2013
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		9/8/2013
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Lukas, Nace, Gutierrez & Sachs, LLP		5/30/2014
Electric Lightwave, LLC	5377	8/13/2014
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RTC Associates, LLC		10/10/2014
RTC Associates, LLC		10/10/2014
RTC Associates, LLC		10/10/2014
		1/9/2015
		1/19/2015

Davis Wright Tremaine		1/22/2015
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		6/23/2015
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Access Wireless		10/27/2015
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Life Wireless	U-4442-C	3/3/2016
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CPUC Office of Ratepayer Advocates		3/16/2017
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		6/7/2017
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Dr.		2/16/2018
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XO Communications Services, LLC	U-5553-C	3/12/2018
Cal.net, Inc.	U-1340-C	3/20/2018
SafetyNet Wireless	U-4458-C	3/26/2018
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Telecom Professionals, Inc.		4/4/2018
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		6/20/2018
Public Utilities Commission		7/3/2018
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Global Connections Inc. of America		7/23/2018
StandUp Wireless		8/28/2018
Moss Adams		10/1/2018
Frontier California Inc.	U1002C	10/6/2018
Vesta Solutions, Inc.	U-7348-C	11/7/2018
		12/12/2018
The Utility Reform Netwok (TURN)		1/7/2019
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Law Offices of Kristin L. Jacobson		3/15/2019

CPUC Communications Division		3/27/2019
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Peak Communications, Inc.	6005	4/15/2019
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Logical Telecom	U-7263-C	12/2/2019
ComNet(USA) LLC	U-7330-C	2/13/2020
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Time Warner Cable Information Services (California)	6874	3/31/2020
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Public Advocates Office		5/17/2020
		8/5/2020
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		10/21/2020
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Google LLC		1/11/2021
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T-Mobile		9/8/2021
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Verizon		1/20/2022
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SnowCrest	U-7172-C	3/9/2022
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Ultimate Internet Access, Inc	U7269C	3/29/2022
		4/8/2022
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The Ponderosa Telephone Co.	U-1014	4/26/2022
Ponderosa Telephone Co		5/4/2022
		5/5/2022
CLA (CliftonLarsonAllen LLP)		7/12/2022
Davis Wright Tremaine LLP		9/9/2022
DigitalPath, Inc		9/29/2022
CGM LLC		10/17/2022
CGM, LLC		10/17/2022
TURN - The Utility Reform Network		11/15/2022
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Nelson Mullins Riley & Scarborough		12/1/2022
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Nelson Mullins Riley & Scarborough		2/6/2023
Center for Accessible Technology		2/14/2023
Hankins Information Technology		2/27/2023



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California Public Utilities Commission



CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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