

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 12, 2019

Notice to All Telecommunications Carriers

Subject: Amended Filing Instructions for Advice Letters, Annual Reports, and Annual Tariff Filings

On November 7, 2019, the California Public Utilities Commission (CPUC) adopted Resolution T-17670, which modified the Communications Division (CD) Advice Letter, Annual Tariff, and Annual Report filing processes to eliminate the CD-ROM and hard copy filing requirements and implement electronic only filing. The revised filing process will take effect on January 1, 2020.

Pursuant to Ordering Paragraph 3 of Resolution T-17670: "Staff shall inform carriers of filing instructions and future filing process revisions via Administrative Letter sent by email and posted on the California Public Utilities Commission (CPUC or Commission) public website at least 30 calendar days prior to implementation."

As of January 1, 2020, all Advice Letter filings from carriers (also known as utilities) must be emailed to TD._PAL@cpuc.ca.gov. Attachment A to this notice is the instructions for Communications Advice Letters filings. Carriers are also reminded to use the updated Advice Letter Filing Summary Form available at the CPUC website: <https://www.cpuc.ca.gov/General.aspx?id=1097>.

All Annual Report and Annual Tariff filings must be emailed to CDCompliance@cpuc.ca.gov. The subject line of the email filing should include the utility name and assigned utility number and the name of the report submitted. Attachment B to this notice is the instructions for Communications Annual Reports and Annual Tariff Filings. Carriers are also reminded to use the CD Compliance Cover Sheet available from the CPUC website: <https://www.cpuc.ca.gov/General.aspx?id=1089>.

For more information on filing instructions go to:

- Advice Letters: <https://www.cpuc.ca.gov/General.aspx?id=1097>
- Carrier Reporting Requirements: <https://www.cpuc.ca.gov/General.aspx?id=1089>
- Annual Reports: <https://www.cpuc.ca.gov/General.aspx?id=1094>
- Annual Tariff Filings: <https://www.cpuc.ca.gov/General.aspx?id=6442462776>

If you have any questions regarding this notice, please contact Penney Legakis at 415-703-2785 or Penney.Legakis@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Risa Hernandez".

Risa Hernandez
Program Manager

Enclosures:

- Attachment A: Instructions for Communications Advice Letter Related Filings
- Attachment B: Instructions for Communications Annual Report and Annual Tariff filings

ATTACHMENT A
Instructions for Communications Advice Letter Related Filings

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A. Communications Carrier Advice Letter Submission Instructions

Step 1. Prepare the Advice Letter (AL) [Original or the Supplement]

1.1 AL Summary Form

Complete the AL summary form (in Portable Document Format (PDF) format and PDF/A compliant).

- a. A carrier's AL filing must be numbered sequentially, beginning with number 1 for the first AL filed. The carrier may send an email to **TD._PAL@cpuc.ca.gov** to verify or request information about the next available number to be used in the AL filing.
- b. If filing a supplement, use the same AL number of the original filing and affix the letter "A", "B", "C" and so on after the number. e.g. AL5A [for the first supplement] or AL5C [for the third supplement]

1.2. Cover Sheet

Complete the cover sheet for the AL filing (in PDF format and PDF/A compliant). Failure to submit a complete AL cover sheet may result in Communications Division (CD) rejecting the AL filing. The AL cover sheet must state in a narrative format the following:¹

- a. Date AL submitted to the CD
- b. Date the AL is served to the appropriate parties
- c. Language that says "protest or response to the AL must be submitted to CD within 20 days of the AL's date of submission and served on the carrier on the same day"
- d. Requested effective date
- e. Service(s) affected (if any) by the AL
- f. CPUC orders, codes or other statutory provisions (by section) related to the substance of the AL

1.3. Supporting Documents

Attach the supporting documents (in PDF format and PDF/A compliant) to the AL cover sheet. Supporting documents vary by type and tier level of an AL. For example, a copy of the bond must be included in an AL filing for performance bond compliance (Tier 1 AL).

Step 2. Prepare the service list

2.1. Service list

All AL filings (including supplements) must be served on the appropriate service list. The carrier should use one of the following six service lists available at <https://ia.cpuc.ca.gov/als/getlist.aspx>:

- a. AL for changes in rates, terms and conditions of service, or new service
- b. AL for eligible telecommunications carrier designation requests
- c. AL for general rate case filings
- d. AL for facility construction filings
- e. AL for negotiated inter connection agreements pursuant to Industry Rule 8.1 and contracts for tariffed services pursuant to Industry Rule 8.2
- f. AL not fitting within the preceding categories

Select the proper list, download and save it in Excel format. Use the Excel file to copy and paste email addresses into email recipient field.

¹ G.O 96-B General Rule 4.6

Convert the downloaded service list to PDF format and save. Include the PDF in the supporting documents.

Step 3. Ensure documents follow these file naming conventions

3.1. PDF format

- a. All AL/supplement files (AL summary form, cover sheet, service list, supporting documents and supplement) must be submitted in PDF format.
- b. Exception: If submitting shapefiles or spreadsheets, carrier should submit both the shape file/Excel file and a PDF copy.

3.2. PDF/A compliance

- a. PDF/A is a format that ensures long-term archiving and reproduction of PDF documents. This ensures that PDF documents are accessible and secure for the long-term.
- b. For Adobe Acrobat, step by step directions on how to achieve PDF/A compliance can be found [here](#).² For Nitro, directions can be found [here](#).³

3.3. Attachment file name format

- a. For an Original AL filing:
 - i. Combine (in this order) AL summary form, cover sheet, service list and supporting documents into one PDF document.
 - ii. Name the combined PDF file as:
[Utility Number] [Carrier Name] [AL Number]
e.g. 9999 XYZ Wireless AL5
- b. For an AL Supplement filing:
 - i. Combine (in this order) AL summary form, cover sheet, service list and supplemental documents into one PDF file.
 - ii. Name the combined PDF file as:
[Utility Number] [Carrier Name] [AL # Letter] [Supplement]
e.g. 9999 XYZ Wireless AL5A Supplement

3.4. File size

- a. Email size limitations
 - i. To ensure delivery, CD is limiting the total file size per email to 5 MB.
 - ii. If attachments exceed 5 MB, the carrier must split the attachment into at least two files and send each file in a separate email. The total size of each email must be below 5 MB.
 - iii. If sending a multi-part email indicate in the email's subject that it is part of a multi-part email (see 3.5 below).
 - iv. If sending a multi-part email, the summary form and cover sheet should be attached in the first email while the service list and supporting documents should be attached to subsequent emails.
- b. When it is **not possible** to send multi part emails, files will be accepted via sFTP.
 - i. Go to secure CPUC's sFTP site⁴

² <https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

³ <https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>

Attachment A: Instructions for Communications Advice Letter Related Filings

- ii. If account has already been created, log in with credentials.
- iii. To set up a new account click 'Need help signing in?' and create user profile.
- iv. Once signed in, go to the "Mail" option (located on the left pane) and compose the email. Do not create a new folder, use email option only.
- v. Attach your data (drag and drop) to the email.

3.5. Email subject format

- a. For an Original AL filing:
**[Utility Number] [Carrier Name] [AL Number] [If Confidential, Indicate Confidential]
[Part X of Y if Submitting Multi-Part Email]**
e.g. 9999 XYZ Wireless AL5
e.g. 9999 XYZ Wireless AL5 Part 1 of 2
e.g. 9999 XYZ Wireless AL5 Confidential
e.g. 9999 XYZ Wireless AL5 Confidential Part 1 of 2
- b. For an AL Supplement filing:
[Utility Number] [Carrier Name] [AL Number-X] [If Confidential, Indicate Confidential] [Part X of Y if Submitting Multi-Part Email]
e.g. 9999 XYZ Wireless AL5A
e.g. 9999 XYZ Wireless AL5A Part 1 of 2
e.g. 9999 XYZ Wireless AL5A Confidential
e.g. 9999 XYZ Wireless AL5A Confidential Part 1 of 2
- c. Use the same email subject format if sending via CPUC's sFTP.

3.6. Email body

The body of the email must contain a brief summary describing the filing.

Step 4. Submit the Advice Letter (or supplement) filing via email

4.1. Submission

The cut off time to be considered filed the same day as submitted is 5:00 PM Pacific Standard Time (PST). Advice Letters or supplements submitted after 5:00 PM PST or on a non-business day will be considered filed the following business day.

- a. For the **public version** of an AL or supplement filing:
 - i. The AL filer or protestor must submit the filing via email to both **TD._PAL@cpuc.ca.gov** and to the appropriate service list (emails from the downloaded Excel file)
- b. For the **confidential version** of an AL or supplement filing:
 - i. The carrier must submit a separate email to **TD._PAL@cpuc.ca.gov** only.
 - ii. The email must contain the confidential version of the AL or supplement along with the required confidentiality declaration. The filing must be submitted in accordance with the confidential document submission process outlined in D.16-08-024.⁵

4.2. Confirmation

Protesters and carriers will receive an automatic reply from **TD._PAL@cpuc.ca.gov** confirming the receipt of the filing.

⁴ <https://cpucftp.cpuc.ca.gov>

⁵ <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M184/K382/184382359.PDF>

B. Carrier Protest to Advice Letters and Response Instructions

Step 1. Prepare the letter of protest or reply to a protest and service list

1.1 Letter of protest and reply to a protest

Any person, groups or organization can protest or respond to an advice letter (AL) **within 20 days** of the AL's date of submittal. The grounds for protest are the following:⁶

- a. The utility did not properly serve or give notice of the advice letter.
- b. The relief requested in the advice letter would violate statute or Commission order or is not authorized by statute or Commission order on which the utility relies.
- c. The analysis, calculations, or data in the advice letter contain material errors or omissions.
- d. The relief requested in the advice letter is pending before the Commission in a formal proceeding.
- e. The relief requested in the advice letter requires consideration in a formal hearing or is otherwise inappropriate for the advice letter process.
- f. The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.

A utility shall reply to each protest and may reply to any response **within five business days** after the end of the protest period. The protestant cannot reply to the utility's reply.

Step 2. Prepare the service list

2.1. Service list

All protests and replies must be served on the **same day** on the utility (by the protestants) and on the protestants (by the utility) respectively. They must also be served on the appropriate service list. The utility and protestant should use one of the following six service lists available at <https://ia.cpuc.ca.gov/alsl/getlist.aspx>:

- a. AL for changes in rates, terms and conditions of service, or new service
- b. AL for eligible telecommunications carrier designation requests
- c. AL for general rate case filings
- d. AL for facility construction filings
- e. AL for negotiated inter connection agreements pursuant to Industry Rule 8.1 and contracts for tariffed services pursuant to Industry Rule 8.2
- f. AL not fitting within the preceding categories

Select the proper list, download and save it in Excel format. Use the Excel file to copy and paste email addresses into email recipient field.

Convert the downloaded service list to PDF format and save. Include the PDF in the supporting documents.

⁶ G.O 96-B General Rule 7.4

Step 3. Ensure documents follow these file naming conventions

3.1. PDF format

- a. All protests, responses and replies must be submitted in PDF format.
- b. Exception: If submitting shapefiles or spreadsheets, carrier or protestant should submit both the shapefile or Excel file and a PDF copy.

3.2. PDF/A compliance

- a. PDF/A is a format that ensures long-term archiving and reproduction of PDF documents. This ensures that PDF documents are accessible and secure for the long-term.
- b. For Adobe Acrobat, step by step directions on how to achieve PDF/A compliance can be found [here](#).⁷ For Nitro, directions can be found [here](#).⁸

3.3. Attachment file name format

- a. For a Protest:
 - i. Combine (in this order) protest and service list into one PDF file.
 - ii. Name the combined file as:
[Utility Number] [Carrier Name] [AL #] [Protest by]
e.g. 9999 XYZ Wireless AL5 Protest by California Advocates
- b. For a Response to Protest:
 - I. Combine (in this order) response and service list into one PDF file.
 - II. Name the combined file as:
[Utility Number] [Carrier Name] [AL #] [Protest Response to] [By]
e.g. 9999 XYZ Wireless AL5 Protest Response to California Advocates by XYZ Wireless

3.4. File size

- a. Email size limitations
 - I. To ensure delivery, CD is limiting the total file size per email to 5 MB.
 - II. If attachments exceed 5 MB, the protestant must split the attachment into at least two files and send each file in a separate email. The total size of each email must be below 5 MB.
 - III. If sending a multi-part email Indicate in the email's subject that it is part of a multi-part email (see 3.5 below).
- b. When it is **not possible** to send multi part emails, files will be accepted via sFTP.
 - I. Go to secure CPUC's sFTP site⁹ (see Appendix B).
 - II. If account has already been created, log in with credentials.
 - III. To set up a new account click 'Need help signing in?' and create user profile.
 - IV. Once signed in, go to the "Mail" option (located on the left pane) and compose the email. Do not create a new folder, use email option only.
 - V. Attach your data (drag and drop) to the email.

⁷ <https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

⁸ <https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>

⁹ <https://cpucftp.cpuc.ca.gov>

3.5. Email subject format

- a. For a Protest:
[Utility Number] [Carrier Name] [AL Number] [Protest by] [Protester's Name]
e.g. 9999 XYZ Wireless AL5 Protest by California Advocates
- b. For a Response to Protest:
[Utility Number] [Carrier Name] [AL Number] [Response to] [Protest by] [Protester's Name]
e.g. 9999 XYZ Wireless AL5 Response to Protest by California Advocates

3.6. Email body

The body of the email must contain a brief summary describing the filing.

Step 4. Submit the protest or response to protest via email

4.1. Submission

The cut off time to be considered filed the same day as submitted is 5:00 PM PST. Protests and responses submitted after 5:00 PM PST or on a non-business day will be considered filed the following business day.

- a. The protester and carrier must submit the filing via email to both **TD._PAL@cpuc.ca.gov** and to the appropriate service list (emails from the downloaded Excel file).
- b. Protests must also be submitted to the carrier.
- c. Responses to protests must also be submitted to the protester.

4.2. Confirmation

Protesters and carriers will receive an automatic reply from **TD._PAL@cpuc.ca.gov** confirming the receipt of the filing.

END OF ATTACHMENT A

ATTACHMENT B
Instructions for Submitting Annual Report and Annual Tariff Filings

- 1. Cover Sheet:** The CD Compliance cover sheet (cover sheet) enables Staff to save, route, and process the report filings.
 - a. The cover sheet is available from the CPUC website at <https://www.cpuc.ca.gov/General.aspx?id=1089>;
 - b. Complete all information in the cover sheet including but not limited to: Company name and address, CPUC Utility Number, filer name and contact information; and Decision/Resolution/General Order or other authorizing document which requires the filing;
 - c. If confidential treatment is requested, carrier must check the box on the cover sheet and attach a confidentiality declaration. The filing must be submitted in accordance with the confidential document submission process outlined in D.16-08-024;¹⁰ and
 - d. Failure to submit the cover sheet may cause a delay in processing the filing or be rejected.

- 2. Format:**
 - a. The report name must follow this naming convention: Carrier U# + Submittal Frequency + Report Name + Year + Reporting Interval + (COV for Cover Sheet or CONF for Confidential or both or neither
 - b. All documents must be submitted in an electronically searchable format; and
 - c. The documents should be combined into one PDF file in the following order: cover sheet, cover letter, and the annual report or annual tariff filing. The file name should match the report name written on the cover sheet.

- 3. Submission:**
 - a. The corporate identification number assigned to the carrier must be included in the email subject line of all filings along with the carrier's name and the name of the report submitted;
 - b. Submit the completed cover sheet with the Annual Report and Annual Tariff filings;
 - c. Filings are submitted electronically only; and
 - d. Filing should only be emailed to **cdcompliance@cpuc.ca.gov**.

- 4. Acknowledgement Receipt:** After your document has been transmitted to the mailbox, you will receive an e-mail receipt acknowledging successful transmission or instructions to resubmit the document following CD's submission requirements.

- 5. Duplicate copies of filings to the Division Director are NOT required.** Do not submit an electronic copy or hard copy to the CD Director once your document has been successfully transmitted and acknowledged.

END OF ATTACHMENT B

¹⁰ <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M184/K382/184382359.PDF>