

Consumer Protection and Enforcement Division

MONTHLY ACTIVITY REPORT

October 2021



**California Public
Utilities Commission**

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OVERVIEW

The Consumer Protection and Enforcement Division (CPED) implements California Public Utilities Commission (Commission) regulations, policies, and licensing for transportation carriers; investigates and enforces against passenger carrier misconduct; and investigates allegations of utility waste, fraud, and abuse. CPED is comprised of two separate programs: Passenger Transportation and Utilities Enforcement.

This report contains information reflecting the month's performance within each CPED program. Information about each program is collected in six different sections: (1) Key Activities, (2) Citations/Fines/Refunds/Telephone Disconnects, (3) Compliance with Ordering Paragraphs, (4) Docket Activity, (5) Outreach/Training/Other Events, and (6) Legislation of Interest.

PASSENGER TRANSPORTATION

The Commission's Transportation Program oversees for-hire passenger carriers (limousines, airport shuttles, chartered and scheduled bus operators, transportation network companies and ferries). The Program consists of two branches: The Transportation Enforcement Branch (TEB) which has three Units, the Airport Enforcement Unit (AEU), Compliance Enforcement Unit (CEU), and Field Enforcement Unit (FEU); and the Transportation Licensing and Analysis Branch (TLAB).

TEB investigates alleged violations, conducts joint inspections, issues warning notices and citations, prosecutes enforcement cases before the Commission and supports civil and criminal cases brought by local prosecutors, such as a district or city attorney. TEB also supports a consumer complaint 800 phone line and conducts outreach activities to educate consumers, carriers, and state and local law enforcement and prosecutors on consumer protection statutes, regulations and policies that affect passenger transportation.

TLAB's Licensing Section analyzes applications from carriers, writes proposed decisions to approve or deny a carrier's CPCN application, issues permits and certificates, and tracks carrier compliance with permit requirements while TLAB's Analysis Section functions as the Commission's subject matter expert on policy matters, and advises decision makers regarding for-hire carriers.

Citations/Fines/Refunds/Telephone Disconnects

Investigations

In October 2021, TEB closed 38 investigation cases and initiated 26 new cases.

Table 1. TEB Enforcement Activity

12-Month Enforcement Activity	Nov 2020	Dec 2020	Jan 2021	Feb 2021	March 2021	April 2021	May 2021	June 2021	July 2021	August 2021	Sept 2021	Oct 2021	Totals
Open Investigations	96	87	81	61	61	73	70	67	67	71	64	74	N/A
New Investigations Initiated	0	6	0	6	14	9	9	18	8	5	15	26	116
Investigations Completed	9	12	20	6	2	12	12	18	4	12	5	38	150
Cease and Desist Notices	4	8	7	11	2	11	6	9	9	2	8	10	87
Warning Letters	0	2	1	0	0	0	0	1	0	1	6	3	14
Telephone Disconnects	0	0	0	0	0	1	0	0	0	1	0	0	2
Citations	5	2	5	2	8	2	4	6	2	4	6	3	49
Citations Appealed	0	1	2	0	0	1	0	0	0	0	1	0	5

Consumer complaints increased by three complaints in October compared to the prior month. This month, the Consumer Intake Unit (CIU) received 19 complaints.

Table 2. TEB CIU Complaints Received

October 2021 CIU Complaint Activity	
Open complaints as of October 1, 2021	5
New complaints received during month	19
Subtotal	24
Less: Complaints closed by CIU directly	8
Complaints Referred to Enforcement during month	13
Open CIU complaints as of October 31, 2021	3

Table 3. CIU Complaints Referred to TEB

	Nov 2020	Dec 2020	Jan 2021	Feb 2021	March 2021	April 2021	May 2021	June 2021	July 2021	August 2021	Sept 2021	Oct 2021
Open Investigations as of first day of Month	20	20	18	17	21	25	20	17	26	32	30	35
New Investigations Initiated	0	0	0	4	5	0	1	15	7	2	9	7
Closed Investigations During Month	0	2	1	0	1	5	4	6	1	4	4	5
Open Investigations as of last day of month	20	18	17	21	25	20	17	26	32	30	35	37
Investigations open longer than 6 months	14	10	9	12	15	10	8	3	3	5	7	6
% Of total investigations open longer than 6 months	70%	56%	53%	57%	60%	50%	47%	12%	9%	17%	20%	16%

Table 4. TEB Fines Assessed, Fines Paid, Consumer Refunds and PUCTRA Underpayment Fees

TEB Fines/Refunds	Nov 2020	Dec 2020	Jan 2021	Feb 2021	March 2021	April 2021	May 2021	June 2021	July 2021	August 2021	Sept 2021	October 2021	Totals
Fines Assessed	\$12,000	\$25,000	\$31,000	\$10,000	\$36,000	\$11,000	\$10,000	\$10,000	\$20,000	\$13,000	\$32,000	\$7,000	\$217,000
Fines Paid	\$1,250	\$3,900	\$5,650	\$2,700	\$11,800	\$13,375	\$11,360	\$9,590	\$17,755	\$14,375	\$15,940	\$14,257	\$121,952
Refunds & CIU Settlements	\$0	\$0	\$0	\$114.76	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$114.76
PUCTRA Underpayment Fees Paid	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,942.76	\$116,942.68	\$68,281.94	\$0	\$191,167.38

Citations

All citations below were issued in October, and some may be under appeal or awaiting a hearing before an Administrative Law Judge.

- T.21-10-001. Throop Enterprises LLC dba Toasted Corks, Temecula (TCP 39568). Case PSG-5553. Fine: \$5,000. Violations: carrier 1) operated without authority; 2) operated without PL&PD; and 3) driver was not enrolled in DMV EPN. Driver also drove without proper CDL Class, operated bus without CHP inspection, and carrier advertised without authority.
- T.21-10-002. Felex Droz and Jerry Drox, dba Wine Tours One, Buellton (Unlicensed) Case PSG-5560. Fine: \$1,000. Violations: carrier 1) operated without a valid authority and 2) advertised without a valid authority.
- T.21-10-003. Ned Walker aka Neddy Walker, dba Great White Limo, Santa Monica (Unlicensed) Case PSG-5579. Fine: \$1,000. Violations: carrier 1) advertised without a valid authority.

Statewide Airport Enforcement Unit Surveillance Activities

- TEB conducted field activities and surveillance at major airports throughout California. Targeted airports included Los Angeles, San Diego, Orange County, Long Beach, Hollywood- Burbank, Ontario, Palm Springs, San Francisco, Oakland, and San Jose. The main purpose was to monitor passenger carrier transportation activities.

In October 2021, AEU conducted surveillance at ten airports. The number of Transportation Charter-Party (TCP) / Transportation Network Company (TNC) / Passenger Stage Corporation (PSC) violations decreased by one in October compared to the prior month. This month, AEU found 117 TCP/TNC/PSC violations.

Table 5. AEU Surveillance Findings

AEU Surveillance Activity	June 2021	July 2021	Aug 2021	Sept 2021	Oct 2021	TOTALS
# of TCP observed	229	213	254	136	192	1024
# of TCP violations found	8	2	4	4	10	28
% of TCP violations found	3.49%	0.9%	1.6%	2.9%	5.2%	2.73%
# of TNC observed	707	781	930	693	862	3,973
# of TNC violations found	147	85	102	114	107	555
% of TNC violations found	20.79%	10.88%	11.0%	16.45%	12.41%	13.97%
# of PSC observed	1	1	2	0	0	4
# of PSC violations	0	0	0	0	0	0
% of PSC violations found	0%	0%	0%	0%	0%	0%

Los Angeles Airport Citation Program

Table 6. LAX Citations and Fines Collected

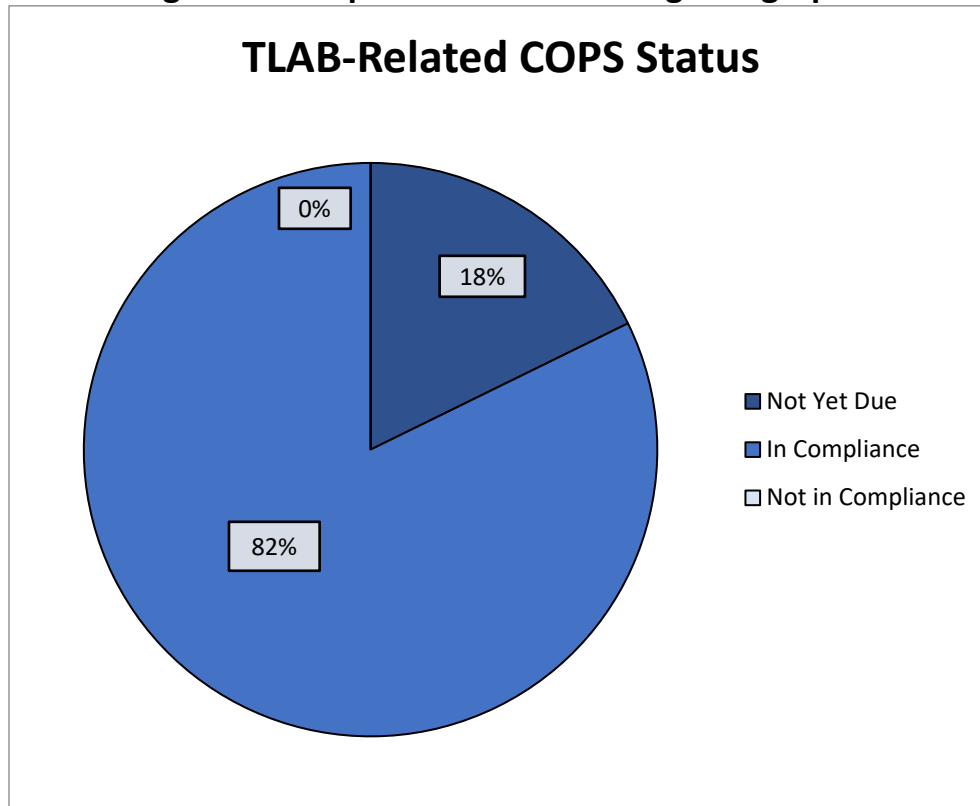
Month	Citations issued by LAX	Citations issued by the Commission	Vehicles impounded	C&D letters issued by the Commission (at LAX only)	Total fines collected
November 2020	2	2	2	2	\$2,000
December 2020	0	0	0	0	\$0
January 2021	0	0	0	0	\$0
February 2021	1	0	0	5	\$0
March 2021	2	1	1	2	\$1,000
April 2021	1	1	1	1	\$1,000
May 2021	4	2	4	4	\$2,000
June 2021	2	1	2	2	\$1,000
July 2021	2	2	2	6	\$2,000
August 2021	0	0	0	8	\$0
September 2021	4	2	4	4	\$2,000
October 2021	1	2	0	3	\$2,000
Totals	19	13	16	37	\$13,000

Telephone Disconnects

- None

Compliance with Ordering Paragraphs

Figure 1. Compliance with Ordering Paragraphs



The Transportation Program is currently responsible for 660 separate Ordering Paragraphs. Many Ordering Paragraphs result from decisions to approve CPCNs for passenger stage corporations, and include permit requirements such as obtaining appropriate insurances, enrolling in drug testing and California Department of Motor Vehicles (DMV) pull-notice programs, receiving bus terminal inspections by CHP and others. Other OPs uphold TEB enforcement actions and impose fines for carrier violations of law and wrongdoing against consumers. OPs also introduce new reporting requirements and transportation policies.

Policy Proceedings

- **R.12-12-011 / TNC Rulemaking / Mason & Chiv / Shiroma.**

1) Proposed Decision adopting The Settlement Agreement Between the Consumer Protection and Enforcement Division, UBER Technologies, Inc., and The Rape, Abuse & Incest National Network, Inc.

- **R.19-02-012 / TNC Rulemaking / Chiv / Shiroma.**

1) No docket activity in October 2021.

Formal Enforcement Proceedings

- **No Order Instituting Investigation (OI)**

Citation Appeal Proceedings

- **K.19-09-015 / Jordan & Associates Investments, dba Sun Buggy Fun Rentals (TCP 38563-Z) Appeal / ALJ Kim.** Concurrent Opening Briefs were filed by July 15, 2021, and Concurrent Reply Briefs filed by August 5, 2021. No further update.
- **K.20-06-003 / David Gorgoyan dba Celebrity Rides (TCP 35518) Appeal / assigned to Administrative Law Judge (ALJ) Sasha Goldberg.** Opening briefs were submitted on September 13, 2021, and Reply Briefs were submitted September 28, 2021. Awaiting next steps.
- **K.21-01-019 / About Time Limousines LLC (TCP 21892). Appeal / ALJ Thomas J. Glegola.** On February 25, 2021, Docket Office informed defendant that his appeal was successful and officially filed. Awaiting ALJ ruling.
- **K.21-02-001 / Bogale Getu Abebe., Hayward (TCP 32714).** On January 11, 2021, received defendant's appeal and filed by ALJ Docket Office. Compliance Filing for Citation F-5729 was filed February 16, 2021. No hearing date set.
- **K.20-09-011 / Eskindir Ghebremedhin and Cristobal Javier Castro, dba Egg Ride Services, (TCP 26381-P) Appeal / ALJ Susan Lee.** On October 6, 2021, ALJ Lee reduced the fine for Citation No. F-5707 from \$3,000 to \$2,200.

- **K.21-09-015 / GoGo Charters LLC (Unlicensed) Appeal / assigned to ALJ Peter Wercinski.**
Compliance filing due October 13, 2021. No hearing date set.

Carrier Application Proceedings

- **A.20-03-010 /** Application of Transit Systems Unlimited, Inc. for authority to Operate as Self-Insured Charter-Party Carrier of Passengers pursuant to Public Utilities Commission General Order No. 115-G / 06/28/2021 Transit Systems filed an Application for Rehearing and Oral Argument / **9/23/21 Commission denied rehearing, Commission decision is upheld.**
- **A.20-09-005 /** Application of Blue & Gold Fleet, L.P. a Delaware Limited Partnership (VCC-77), for Authorization to Discontinue Scheduled Passenger Transport Service Between San Francisco and Tiburon / **09/13/21 Opening Briefs Filed; 09/23/21 Reply Briefs Filed**
- **A.19-05-0030 /** Application of Tres Estrellas de Oro Inc. to amend its Certificate of Public Convenience and Necessity (CPCN) To Operate as a Scheduled Passenger Stage Corporation / **No decision to date.**
- **A.19-09-011/** Application of PropSF, LLC (VCC94) to amend its Vessel Common Carrier Authorization to Add Unscheduled Prearranged Service Between Points in San Francisco, Marin, the Peninsula, and the East Bay, Establish Rates and a ZORF for Unscheduled Service, and Request a ZORF of 20% for Both Scheduled and Unscheduled Services / **09/23/21 Petition for Modification Filed**

Outreach

- On 10/7/2021, three representatives from TEB attended the California Highway Patrol Commercial Vehicle Safety Summit held at Delta Hotels by Marriott, Garden Grove, Ca. TEB representatives provided information to attendees at our CPED TEB table before and after each of the breakout sessions.
- On 10/28/2021, four representatives from TEB Field Enforcement attended a meeting with the Temecula Valley Winegrowers Association and the wineries in Temecula, CA to discuss future enforcement efforts in the Temecula wine region.

Training for Managers, Supervisors, and Staff

- TCT training
- Risk Assessment Q3 workshop.

Joint Agency Collaboration

- TEB investigators, San Francisco International (SFO) Airport Ground Transportation Unit (GTU), and SFO Airport Police working jointly on an ongoing basis, to address complaints of unlicensed providers of passenger transportation at SFO.
- 10/7/2021 San Diego International (SAN) Inspection – TEB Airport Enforcement staff participated in a one-day operation in the staging lot at SAN.
- 10/12/2021 Los Angeles International Airport (LAX) Inspection – TEB Airport Enforcement staff, participated in a one-day operation in the staging lots of the TNC and TCP carriers at LAX.
- 10/12/2021, Golden One Center Inspection - TEB Field Enforcement staff participated in a field operation with Sacramento Police Department.
- 10/29/2021, San Diego P.D. Joint Operation – TEB Field Enforcement Staff participated in a one-night operation in the San Diego Gaslamp District.

UTILITIES ENFORCEMENT BRANCH

UEB protects California utility consumers from fraud and abuse by developing enforcement mechanisms and ensuring service providers comply with consumer protection laws and regulations. UEB investigates alleged violations by utilities, including communications (both wireline and wireless), energy (both electric and gas), and water companies. When sufficient evidence of violation is uncovered, UEB brings cases before the Commission to seek appropriate penalties and remedies for consumers.

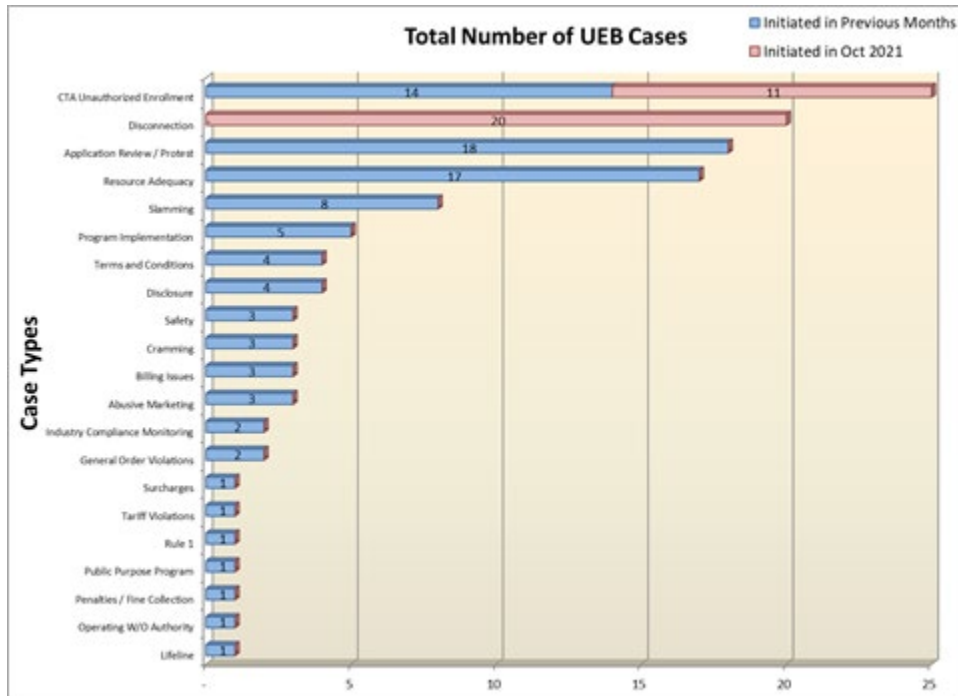
Monthly Highlights

- **Frontier Communications Service Outage OII (I.19-12-009):** On October 6, 2021, ALJ Zhang held a status conference to discuss the schedule for the investigation. CPED and Frontier requested that the ALJ set a date of November 8, 2021 for the filing of a revised proposed settlement. On October 18, 2021, ALJ Zhang issued an email ruling setting forth the schedule for the investigation.
- **San Diego Community Power (SDCP) RA Citation Appeal (K.21-03-005):** On October 15, 2021, CPED and SDCP filed Reply briefs. CPED requests that the Commission deny this appeal and uphold the full citation amount against SDCP because SDCP admitted it rejected offers for available resources and failed to explore RA in other regions.
- **Western Community Energy (WCE) RA Citation Appeal (K.21-03-006):** On October 6, 2021, ALJ Wercinski issued an email ruling granting WCE's motion to stay the proceeding through January 31, 2022.
- **Commercial Energy RA Citation Appeal (K.21-08-001):** On October 18, 2021, CPED and Commercial Energy filed a joint response to ALJ Chive's September 30, 2021 email ruling requesting a joint submission.
- **One-Ring CPCN Application Protest (A.21-02-006):** On October 20, 2021, One-Ring filed a motion to withdraw its CPCN application on the basis that it no longer intends to provide service in California. One-Ring's initial application was to satisfy the FCC's requirement to receive grants from the Rural Digital Opportunities Fund. However, when the FCC informed One-Ring that there would be a significant reduction in RDOF funding, One-Ring moved to surrender its entire RDOF award. Subsequent to One-Ring's motion, the Executive Director issued a decision (D.21-10-034) on October 26, 2021 granting One-Ring's motion for withdrawal.

Key Activities

UEB is working on a total of 124 cases. Investigations center primarily on Application Review, CTA Unauthorized Enrollment, Disconnections, and Resource Adequacy. UEB's cases come from a variety of sources, with Inter-Division referrals and UEB's own scanning activities playing key roles.

UEB Total Number of Cases by Type as of October 31, 2021



Citations/Fines/Reparation

In October 2021, UEB issued eleven citations totaling \$7,636,260 via the Resource Adequacy Citation program. Cumulative 2021 fines, reparations and penalties imposed are shown below.

Table 7. UEB Fines, Reparations, and Penalties

Date	Citations/Fines/ Reparation
October 2021	\$7,636,260
Cumulative 2021	\$55,459,684

- Resource Adequacy (RA) Citation Program:** UEB issues citations and levies fines to enforce Load Serving Entities' (LSE) compliance with system, local, and flexible resource adequacy requirements pursuant to Resolution E-4195, as modified by Decisions 10-06-036, 11-06-022, 14-06-050, 19-06-026, and 20-06-031. UEB received 13 RA case referrals from Energy Division in September 2021. UEB completed one case assessment and issued eleven citations totaling \$7,636,260 and received payment for three citations totaling \$2,827,836 in October 2021. Details for citations issued are shown below.

Table 8.UEB Resource Adequacy Citations

RESOURCE ADEQUACY CITATIONS OCTOBER 2021					
Energy Citation #	Date Issued	Company	Citation Amount	Date Due	Status
E-4195-0102	10/26/2021	East Bay Community Energy	\$652,529.60	11/29/2021	payment/appeal pending
E-4195-0103	10/4/2021	Central Coast Community Energy	\$1,121,899.20	11/3/2021	Payment received 10/15/2021
E-4195-0109	10/8/2021	Pilot Power Group	\$181,063.20	11/8/2021	payment/appeal pending
E-4195-0104	10/5/2021	East Bay Community Energy	\$1,171,094.40	11/4/2021	payment/appeal pending
E-4195-0105	10/14/2021	EDF Industrial Power	\$92,973.60	11/14/2021	Payment received 10/28/2021
E-4195-0106	10/5/2021	Central Coast Community Energy	\$1,612,963.20	11/4/2021	Payment received 10/15/2021

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E-4195-0110	10/8/2021	Pilot Power Group	\$325,274.40	11/8/2021	payment/appeal pending
E-4195-0107	10/4/2021	San Diego Community Power	\$581,817.60	11/4/2021	payment/appeal pending
E-4195-0108	10/13/2021	San Jose Clean Energy	\$758,263.20	11/12/2021	payment/appeal pending
E-4195-0111	10/5/2021	Silicon Valley Clean Energy	\$571,250.40	11/4/2021	payment/appeal pending
E-4195-0113	10/21/2021	Shell Energy North America	\$567,132.50	11/21/2021	payment/appeal pending

- Core Transport Agent (CTA):** UEB reviews CTA-related complaints received by the Commission to enforce compliance with the standards for verification of change in provider requirements in D. 18-02-002, and to identify acts constituting grounds for suspension or revocation of registration pursuant to Pub. Util. Code Section 983.5.

In October, UEB reviewed 73 CTA-related complaints received by the Consumer Affairs Branch (CAB) in September 2021 and identified 20 needing investigation for potential unauthorized enrollment. Staff identified 10 duplicate cases. UEB issued 10 data requests for proof of enrollment authorization for 19 customers. One complaint did not have enough information in CAB's Consumer Information Management System (CIMS) to be included in the data requests. UEB received 13 third-party verification (TPV) recordings and 2 signed agreements as proof of customer authorization to enroll in CTA services. Three customers did not have service accounts with the alleged CTAs and one customer was enrolled prior to the adoption of Resolution UEB-003. After reviewing the information provided, staff determined that the CTAs obtained customer authorization before enrolling them in CTA service in all cases. Staff reviewed all data request responses and recommended no further investigation.

On October 8, 2021, Bolt Energy Services, LLC paid the \$1,000 citation that was previously issued on September 9, 2021 (Citation No. UEB-003-0056).

Table 9.UEB CTA-Related Complaints

Month Received	CTA-Related Complaints		Data Requests Issued	Proof of Authorization Obtained	Citations Issued	Cease and Desist Letters Issued
	Total Reviewed	Unauthorized Enrollment				
September	81	13	5	13	Pending	0

Compliance with Ordering Paragraphs

There were no new Ordering Paragraphs added to UEB’s COPS tracker for the month of October. UEB was responsible for 41 separate Ordering Paragraphs. As of October 2021, 41 of the Ordering Paragraphs (representing 100%) have been complied with, thus none are out of compliance.

Ordering Paragraphs related to UEB’s work are attributable to the imposition of fines, adoption of settlements, ordering of consumer refunds or reparation and other remedies and corrective actions, including reporting requirements, resulting from UEB’s investigations of violations of law and wrongdoing against consumers.

The numbers reported above tracks compliance with ordering paragraphs assigned to UEB and do not include tracking for compliance with payment of fines, penalties, surcharges, or the like, which are assigned to Fiscal Office under the COPs system. However, UEB staff also tracks such payments separately in our case management system and informs fiscal of any identified issues.

Table 10 UEB-Related Proceedings

Docket No.	Title	ALJ	Commissioner
R.18-07-005	Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.	Kelly	Aceves
R.18-12-005	Ruling directs Pacific Gas and Electric Company to show cause why it should not be sanctioned for violation of Public Utilities Code § 451 and Commission statutes by failing to properly communicate with its customers, and coordinate with local governments and Public Safety Partners during the Public Safety Power Shutoff (PSPS) events during October 9 - November 1, 2019, resulting in a risk to public safety.	Semcer/ Poirier	Batjer
I.17-04-021	Order Instituting Investigation on the Commission's Own Motion into the Billing Practices of Southern California Gas Company (U904G); and Order to Show Cause Why the Commission Should not Revise Rule No. 14, Impose Penalties and/or Other Remedies for Extending Billing Periods and Issuing Untimely Monthly Bills.	Ayoade	Rechtschaffen
I.18-07-009	Order Instituting Investigation on the Commission's Own Motion into the California's One Million New Internet Users Coalition's Misuse of California Advanced Services Fund Grant Funds; and Order to Show Cause Why the Commission Should Not Impose Penalties and/or Other Remedies for Violating Terms of Their Grant and for Refusing to Return Funds.	Zhang	Rechtschaffen
I.19-12-009	Order Instituting Investigation on the Commission's Own Motion into the Operations, Practices, and Conduct of Frontier Communications to Determine Whether Frontier Violated Laws, Rules and Regulations through Service Outages and Interruptions and Disclosing and Publishing Customer Addresses.	Zhang	Batjer

K.19-03-024	Appeal of San Jose Clean Energy to Citation E-4195-0052 issued on February 27, 2019 by the Consumer Protection and Enforcement Division.	Kim	N/A
K.20-04-005	Appeal of San Jose Clean Energy to citation E-4195-74 issued on April 10, 2020 by Consumer Protection & Enforcement Division.	Yacknin	N/A
K.20-05-006	Appeal of Clean Power Alliance of Southern California to citation E-4195-82 issued on April 9, 2020 by Consumer Protection & Enforcement Division.	Yacknin	N/A
K.21-03-005	Appeal of San Diego Community Power to citation E-4195-98 issued on February 3, 2021 by Consumer Protection & Enforcement Division.	Golberg	N/A
K.21-03-006	Appeal of Western Community Energy to citation E-4195-99 issued on February 9, 2021 by Consumer Protection & Enforcement Division.	Wercinski	N/A
K.21-08-001	Appeal of Commercial Energy to citation E-4195-100 issued on July 1, 2021 by Consumer Protection & Enforcement Division.	Chiv	N/A
A.21-02-006	Protest of One-Ring's Certificate of Public Convenience and Necessity to Operate as a Competitive Local Exchange Carrier.	Liang-Uejio	Aceves

Outreach/Training/Other Activities

State National Action Plan (SNAP): On October 21, 2021, the FCC presented updates in its continuing efforts to eliminate robocalls. A pressing problem discussed is that large portions of unlawful robocalls terminating in the US were originated in another country and having used false caller IDs. Due to the difficulty with blocking and authenticating foreign robocalls, the FCC proposed in a Fifth Further Notice of Proposing Rulemaking (FNPRM) additional rules to govern gateway providers (point of entry for foreign-originated illegal robocalls). The additional rules include 1) requiring gateway providers to respond to traceback requests within 24 hours, 2) implementing mandatory blocking requirements for both gateway providers and the U.S.-based provider that receives the call from the gateway provider, and 3) requiring gateway providers to confirm authorization of foreign call originators using U.S. telephone numbers.