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California Public Utilities Commission
c/o April Mulqueen
505 Van Ness Avenue
San Francisco, California, 94102
Email: April.Mulqueen@cpuc.ca.gov

Re: Resolution M-4849: Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Consumer Protections

The California Cable & Telecommunications Association (“CCTA”)¹ respectfully submits this reply in accordance with the comment period set forth in the January 15, 2021 Notice of Draft Resolution M-4849 and limits its reply to one portion of the comments submitted on January 22, 2021 by the Joint Consumers.² The Joint Consumers ask the Commission to modify draft Resolution M-4849 to extend the voice disconnection moratorium recently adopted in Resolution M-4848 to June 30.³ The Commission should reject this request because it is both procedurally improper and unwarranted.

As the Joint Consumers acknowledge, the voice disconnection moratorium is separate and distinct from the measures adopted in Resolution M-4842, which will be extended by Resolution M-4849. As such, it is procedurally improper to extend the end date of consumer relief measures in one resolution through a different resolution that provides a different set of consumer relief measures. Moreover, the Commission already has in place a straightforward procedure to extend the voice disconnection moratorium should future circumstances warrant.⁴

In addition, the Joint Consumers provide no explanation as to why the voice disconnection moratorium’s end date, presently April 21, should be extended at this time. Indeed, extending the voice disconnection moratorium now is unwarranted and ill-advised given the highly dynamic and rapidly-evolving nature of the COVID-19 pandemic.

¹ CCTA is a trade association consisting of California’s incumbent cable television providers that have collectively invested more than \$40 billion in California’s broadband infrastructure since 1996 and whose systems pass approximately 96% of California’s homes.

² The Joint Consumers are comprised on The Utility Reform Network, National Consumer Law Center, and Center for Accessible Technology.

³ Joint Consumers Comments at 3.

⁴ Res. M-4848 at 17, Ordering Paragraph 5.

Accordingly, the Commission should reject the Joint Consumers' request to modify Resolution M-4849 so as to prematurely extend the end date of the voice disconnection moratorium.

Sincerely,

/s/ Jerome F. Candelaria

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