



Janice Ono
Area Manager - Regulatory

5250 S. Virginia Street
Suite 201
Reno, NV 89509

T: 775-333-3991
JO5243@att.com

VIA ELECTRONIC FILING

[PUBLIC - REDACTED]

December 9, 2020

The Honorable Chair and Members of the
Hawaii Public Utilities Commission
465 South King Street
Kekuanaoa Building, Room 103
Honolulu, HI 96813

Re: November 25, 2020 Commission Request for Feedback from Utilities and the
Consumer Advocate on the Suspension of Termination or Disconnection of
Regulated Utility Services Due to Non-Payment

Dear Commissioners and Staff:

Please find enclosed the joint response by New Cingular Wireless PCS, LLC and Cricket Wireless LLC (together "AT&T") who are providers of wireless service in the State of Hawaii to the Hawaii Public Utilities Commission's ("Commission") above-referenced November 25, 2020 Request for Feedback.

AT&T stands fully prepared to meaningfully care for our customers facing a time of need or difficulty during the COVID-19 Pandemic. We are aware of the vast and devastating effects the pandemic has had on our communities, front line, and essential workers, employees, and neighbors. When the scope of the pandemic became apparent, as previously shared with the Commission¹, AT&T provided customer benefits, support and financial donations targeted at providing the connectivity that our customers and community most needs and requires.

AT&T supports the comments submitted by CTIA in this proceeding, and in our responses below, responds to the data requests posed by the Commission and further shares the ways AT&T has supported our customers and our communities during the ongoing pandemic.

¹ See ATTACHMENT A, March 16, 2020 email from Cyndi Gallagher to the Hawaii PUC Commissioners.

Responses to Questions for Utilities

Question Set 1 - Lifting the Suspension of Disconnection for Non-Payment

- a) Do you think the Commission should extend the disconnection suspension for all your customers beyond December 31, 2020? If so, when do you think the suspension should subsequently be lifted (e.g., by a specific date, at the end of Pandemic, etc.)?**
 - i. Alternatively, do you think the suspension should end for certain customer classes before others, and if so, which customer classes, and when?**
- b) If the suspension is not extended beyond December 31, 2020, would your Utility request authority to voluntarily suspend disconnections?**

AT&T Wireless Answer:

1) Lifting the Suspension of Disconnection for Non-Payment

To support our customers, AT&T opted into the FCC's Keep America Connected Pledge ("Pledge")(<https://www.fcc.gov/keep-americans-connected>). AT&T believes the Pledge was successful because it was voluntary, of limited duration, and permitted carriers flexibility in offering relief to customers. In addition to our support of the Pledge, AT&T has, since its expiration, continued to adhere to the recommendations of this Commission and suspended disconnects for wireless services across Hawaii.

AT&T urges the Commission to invite each carrier to voluntarily make its own customer retention offers building on each carrier's individualized current practices for a limited duration but subject to extension as warranted, in the spirit of the Pledge. Extending the disconnect suspension for ALL customers, regardless of their ability to pay their bills, is not supported by the record.

Should the suspension of disconnect be extended and modified to limit the moratorium for customers who have been economically impacted by the pandemic, such action may adversely impact those the order is intended to protect. A moratorium on disconnections of indefinite duration may unintentionally harm customers by adversely affecting their ability to stay connected in the long run.

Question Set 2 – Financial Impacts on Utilities

- a) How many of your Utility customers (of each customer class) have past due balances for utility service, and what is the total cumulative past due balance for all customers? Please break out past due balances by timeframe (e.g.,**

past due by less than 30 days, by greater than 30 days, by greater than 60 days, by greater than 90 days, etc.), if available.

- b) How would an extension of the disconnection suspension for 1 month, 3 months, or 6 months, respectively, affect the financial condition of your Utility?**
- c) What data and/or financial information does your Utility think would be helpful to provide to the Commission on a going-forward basis to help the Commission continue to make decisions around disconnection suspension and related issues?**

AT&T Wireless Answer:

Because AT&T Mobility considers information related to its customer counts, revenues and financial results to be proprietary and confidential, AT&T Mobility is submitting the response to 2(a) under seal, pursuant to Protective Order No. 37141 filed on May 15, 2020.²

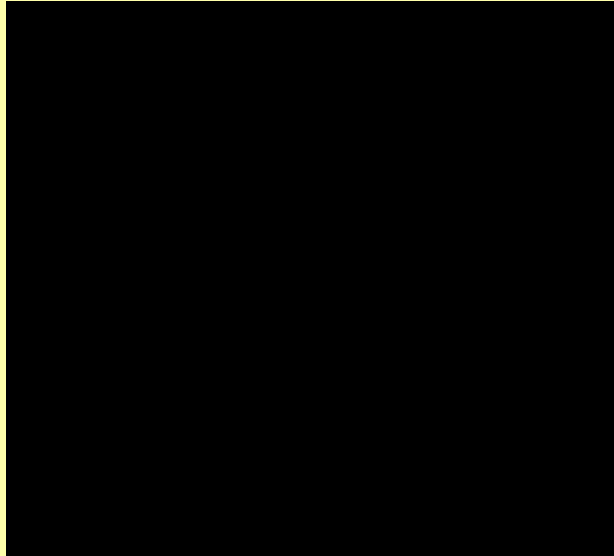
The wireless telecommunications business in Hawaii is highly competitive. Information concerning AT&T Mobility's subscriber count and revenues is confidential because significant information about its business operations can be extrapolated or derived, which would be useful to any competitor in determining how to compete with AT&T Mobility.

Disclosure of this confidential information will likely cause competitive injury to AT&T Mobility. With numerous wireless competitors operating in Hawaii, these competitors could utilize the confidential and proprietary business information to help establish business and marketing strategies to their advantage. The confidential information would not ordinarily be disclosed to others outside AT&T Mobility. The confidential information should be withheld from public disclosure as long as such information could provide a basis for competitors to gain insight into AT&T Mobility's business operations.

²See ATTACHMENT B – Protective Order No. 37141 dated May 15, 2020.

BEGIN REDACTION:

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER



**Confidential Information
Deleted Pursuant To
Protective Order No. 37141**

END REDACTION:

Because of the numerous variables that could impact future disconnect volumes, the potential future financial impact is not readily ascertainable. AT&T does not recommend additional reporting beyond that which is already required under the Hawaii Administrative Rules.

Question Set 3 – Protections for Customers (Including Those Experiencing Financial Hardship)

- a) **What mechanisms exist, or are you considering implementing, for customers to alert your Utility that they are experiencing financial hardship or otherwise need special customer protections related to their utility bill or service?**
- b) **What types of payment plans is your Utility currently offering, or contemplating offering, to customers? Please include information regarding the proposed minimum and maximum lengths of these payment plans, including those that may be established specifically for vulnerable customers (e.g., customers experiencing financial hardship, low-income customers, customers with special medical needs, etc.).**

- c) What, if any, specific customer protections are your Utility offering or contemplating offering to vulnerable customers (e.g., customers experiencing financial hardship, low-income customers, customers with special medical needs, etc.)?**
- d) Are there other specific customer protections that you think should be extended or newly implemented?**

AT&T Wireless Answer:

AT&T has long employed business-as-usual practices – that pre-date the COVID-19 pandemic and AT&T’s participation in the Pledge – to assist our customers. These include a flexible billing and collections process that works with customers facing economic difficulties. Our priority is to help keep customers connected.

Thus, customers have ready access to basic payment arrangement extensions and remedies available through our website³ and the MyAT&T mobile app, as well as through our customer service representatives at our call centers. In our call centers, AT&T representatives evaluate situations faced by our customers on a case-by-case basis and, when customers face extreme conditions, can seek management approval for additional latitude for to allow customers to extend their payment dates beyond defined guidelines. This process applies across our services with only slight variations in treatment paths depending on credit risk. AT&T uses these tools to keep customers informed of their options and to customize resolutions for each customer according to their particular needs, challenges, and preferences.

Question Set 4 - Customer Engagement

- a) What communications regarding the disconnection suspension and other customer protections (including those provided by outside sources, such as COVID-19 relief funds) have you provided to your customers during the Pandemic?**
- b) When and how is your Utility planning to notify customers, if you have not already, that they are at risk for disconnection or termination of regulated utility services upon the lifting of the suspension?**
- c) How is your Utility communicating payment plans (or, planning to communicate payment plans) and other options to customers who are at risk**

³ See <https://www.att.com/support/article/my-account/KM1025834/> for information on payment arrangements.

for disconnection? Are you currently conducting, or planning to conduct, this outreach prior to any lifting of the suspension?

AT&T Wireless Answer:

Since the beginning of the pandemic, AT&T has been engaged in providing customer benefits, support, and financial donations targeted at providing the connectivity that our customers and communities most need.

As noted above, on March 13, 2020, AT&T joined other providers in the Pledge, committing not to terminate the account of any wireless, home phone, or broadband residential or small business customer because of the inability to pay their bill due to disruptions caused by the pandemic for 90 days through June 30, 2020. AT&T also agreed to waive any late payment fees that any postpaid wireless, home phone, or broadband residential or small business customer may have incurred due to economic hardship related to the pandemic.

During the Pledge, AT&T made other commitments and efforts beyond those included in the Pledge to assist customers impacted by the pandemic:

- From March 13, 2020 to June 30, 2020, for residential and small business customers, AT&T Mobility waived domestic voice, data, and text overage fees to give people working from home and using more data the opportunity to take advantage of unlimited internet data without paying any overage fees, even if they exceeded any data caps applicable to their current plans.
- On March 27, 2020, AT&T Mobility launched a limited time phone plan for new and existing customers of AT&T Prepaid, a prepaid service sold by AT&T Mobility that comes with 2GB of data with unlimited talk and no activation fee. AT&T Prepaid is also adding 10GB of data to capped phone plans for a limited time. New and existing customers with AT&T Prepaid's Unlimited Plus plan with Mobile Hotspots who activated the plan before April 26, 2020 received an additional 10GB of data at Mobile Hotspots per month for 60 days.

In addition to our ongoing efforts initiated during the Pledge and our pro-customer business-as-usual practices as described above, AT&T has continued to support our customers affected by COVID-19 in multiple ways since the expiration of the Pledge on June 30, 2020:

- We are supporting students, teachers and schools by providing resources for remote learning and teaching, including broadband and wireless offerings, a \$10 million distance learning fund, a matching gift program supporting distance-learning projects in low-income communities, and more.

- We are offering a \$15/month unlimited wireless data plan to more than 135,000 public and private K-12 schools, colleges, and universities for their students and teachers across the country that also includes a free hot spot. For every 24 student activations, schools can activate one line with the same unlimited wireless data plan at no cost for a teacher. Schools may sign up for this offer through December 29, 2020, and schools that add at least one eligible line as part of this offer before that date may activate additional lines for the same price through December 29, 2022 when the promotional pricing ends.
- Working with Connected Nation, a non-profit organization helping communities solve broadband and digital technology challenges, we are also making a \$10 million contribution to close the homework gap for at-risk students disconnected from learning with internet connectivity and Wi-Fi hotspots. This and will expand the availability of tech-enabled tools and learning resources for students, teachers, schools and parents.
- We offer teachers, first responders, military and veterans an extra 25% savings on select wireless plans.

Specific to Hawaii, in addition to opting into Pledge through June 30, 2020, AT&T has honored the Commission's cessation of suspensions/disconnections pursuant to Public Utilities Commission Order 37125, as subsequently extended. AT&T also maintains a website that includes a section on AT&T's response to COVID-19 challenges (<https://about.att.com/pages/COVID-19.html>) and information offering online customer assistance during the COVID-19 pandemic (<https://www.att.com/help/covid-19/>). The website also includes information for AT&T customers in Hawaii <https://about.att.com/pages/COVID-19.html#consumers> (then click on "Consumers" hyperlink). Informing customers that they are at risk for disconnection of service or the availability of payment plans is a business as usual procedure.

Conclusion:

AT&T remains steadfast in our commitment to support our customers as we all continue to cope with the ongoing pandemic. In these uncertain times, AT&T continues to do our part now and well into the future. AT&T immediately acted and implemented policies to protect its customers and its employees from the pandemic's harm, by initiating policy changes, service accommodations, and financial commitments as described above. AT&T remains dedicated to seeing our communities survive this crisis.

December 9, 2020
Page 8

Thank you for inviting carrier input and for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Janice Ono", with a stylized, cursive script.

Janice Ono

Enclosures

cc: Consumer Advocate (dnishina@dcca.hawaii.gov; consumeradvocate@dcca.hawaii.gov)
Carol Anderson, Esq. (w/o enclosures)

From: GALLAGHER, CYNDI

Sent: Monday, March 16, 2020 9:46 AM

To: 'leo.r.asuncion@hawaii.gov' <leo.r.asuncion@hawaii.gov>; 'jennifer.m.potter@hawaii.gov' <jennifer.m.potter@hawaii.gov>; 'james.p.griffin@hawaii.gov' <james.p.griffin@hawaii.gov>

Subject: AT&T's response to COVID-19

Dear Commissioners:

I would like to provide you with an update on what AT&T is doing for our customers, employees, stakeholders, and network during the growing Coronavirus (COVID-19) pandemic.

For our customers and communities:

Keep Americans Connected Pledge:

For the next 60 days:

- We will not terminate the service of any wireless, home phone or broadband residential or small business customer because of their inability to pay their bill due to disruptions caused by the coronavirus pandemic.
- We will waive any late payment fees that any wireless, home phone or broadband residential or small business customer may incur because of economic hardship related to the coronavirus pandemic.
- We will keep our public Wi-Fi hotspots open for any American who needs them.

These actions are consistent with FCC Chairman Pai's "Keep Americans Connected Pledge" announced yesterday and concerns raised by members of Congress, which we share.

Additional relief and support we have also announced include:

- **Unlimited AT&T Home Internet** – All AT&T consumer home internet wireline customers, as well as Fixed Wireless Internet, can use unlimited internet data. Additionally, we'll continue to offer internet access for qualifying limited income households at \$10 a month through our Access from AT&T program.
- **Helping You Work and Learn Remotely** – Businesses, universities and schools can keep their teams and classrooms connected through conference calls and video conferencing with Cisco Webex Meetings with AT&T for 90-days, and seamlessly forward calls to both mobile and landline phones with AT&T IP Flexible Reach.
- **Distance Learning** – AT&T is underwriting expenses for a "one-stop" resource center to support eLearning Days from the [State Educational Technology Directors Association \(SETDA\)](#) available to all educators in schools to help them handle school closures and the increase in virtual learning due to COVID-19.

We offer multiple options to keep customers connected if they have concerns about getting out in the community or are unable to make it to a store. [MyAT&T](#) and [att.com](#) give customers easy access, and our [AT&T Ready to Go](#) option brings the retail experience to customers when and where they choose.

Coordinating with public safety stakeholders:

We have been coordinating for many weeks with public safety stakeholders to support the efforts addressing travelers returning to the United States who needed to be quarantined. Our efforts have included responding to needs expressed from our public safety partners, including providing COWs, readying FirstNet COWs and COLTs for quick deployment, optimizing existing coverage, and ensuring

fiber is live for transport if needed. We have provided support for our public safety partners at Miramar Air Base, Travis Air Force Base, Port of Oakland, Pacific Grove (Asimolar), and March Air Reserve Base. We understand how challenging and fluid this situation is and remain committed to partnering with local, state and federal officials.

For our employees:

Work From Home Policy:

Employees who are in jobs that can be done from home have been directed to do so until further notice. For employees whose jobs cannot be done from home, including those who serve and interact with our customers, we are taking additional safeguards and implementing new procedures and policies to help protect the health and safety of our workforce. This includes:

- Paid time off for employees at higher risk or in quarantine
- Paid time off for parents during school and daycare closures

We are taking additional actions to keep our employees safe:

- We have restricted international business travel for employees
- We have placed limits on domestic travel
- We have discouraged meetings with vendors that would normally require travel. We've cancelled employee attendance at all large internal and external conventions, forums, conferences, and events that require travel.

Network Preparedness & COVID-19

As a global company, we have extensive experience in planning for and responding to a wide variety of situations around the world. Our teams are closely monitoring developments in the COVID-19 outbreak and are taking the appropriate steps – consistent with CDC and WHO recommendations – to help maintain the ongoing health and safety of our employees and customers.

As of this point:

- Our network continues to perform well including in cities where the coronavirus has had the biggest impact.
- We continuously monitor our network performance for trends to manage our network.

For resources to help customers plan and mitigate unforeseen events, we have resources available at the [AT&T Business Continuity Website](#).

We have set up a dedicated site to answer questions regarding COVID-19, and provide regular updates and general info: <https://about.att.com/pages/COVID-19.html>

Please don't hesitate to contact me; should you have any questions.

Cyndi Gallagher

Director-External Affairs

AT&T External & Legislative Affairs

161 Inverness W, Room 153D, Englewood, CO 80112
w 720.472.3624 | m 785.633.2966 | cg6985@att.com

Keep your eyes on the road, not on your phone.
Take the pledge...[It Can Wait](#).

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

----- In the Matter of -----)
)
PUBLIC UTILITIES COMMISSION) (Non-Docketed)
)
Letter Request from the Consumer)
Advocate for Commission Suspension of)
Authority of Regulated Companies to)
Terminate or Disconnect Services Due)
to Non-Payment and/or Assess)
Unreasonable Charges or Fees During)
the COVID-19 Pandemic.)
)
_____)

PROTECTIVE ORDER NO. 37141

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

----- In the Matter of -----)
)
PUBLIC UTILITIES COMMISSION) (Non-Docketed)
) Protective Order No. **37141**
Letter Request from the Consumer)
Advocate for Commission Suspension of)
Authority of Regulated Companies to)
Terminate or Disconnect Services Due)
to Non-Payment and/or Assess)
Unreasonable Charges or Fees During)
the COVID-19 Pandemic.)
)
_____)

PROTECTIVE ORDER

The Public Utilities Commission ("Commission"), on its own motion, issues this Protective Order to govern the classification, acquisition, and use of trade secrets, and other confidential information produced in this non-docketed matter and filed pursuant to the Commission's Non-Docketed Order No. 37125, "Addressing the Consumer Advocate's Request for Suspension of Termination or Disconnection of Regulated Utility Services Due to Non-Payment and/or Assessment of Other Charges During the COVID-19 Pandemic," filed on May 4, 2020 ("Order No. 37125").

I.

BACKGROUND

By letter request dated April 23, 2020, the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS, DIVISION OF CONSUMER ADVOCACY ("Consumer Advocate") requested that the Commission temporarily suspend the authority of Commission-regulated electric, gas, telecommunications, water, and wastewater public utilities ("Utilities," or "Utility," individually), to terminate or disconnect service due to non-payment by customers, and to temporarily suspend the authority of these Commission-regulated utilities to assess any charges or fees that might be unreasonably assessed, for the duration of the ongoing COVID-19 pandemic.¹

On May 4, 2020, the Commission issued Order No. 37125, addressing the Consumer Advocate's Letter Request and providing specific guidance to the Utilities during the pendency of the Governor's Emergency Proclamation² and until otherwise ordered by

¹Consumer Advocate Letter re: "Commission Investigation to Address COVID-19 Impacts on Consumers and Regulated Companies," filed on April 23, 2020 ("Consumer Advocate's Letter Request").

²As of the date of the issuance of Order No. 37125, on May 4, 2020, and as noted at n.2, Governor David Y. Ige ("Governor Ige"), had issued his Sixth Emergency Proclamation on April 25, 2020, which amended and restated all prior proclamations and executive Orders related to the COVID-19 emergency. On May 5, 2020, Governor Ige issued his Seventh Supplementary Proclamation, which amends and restates all prior proclamations and executive orders related to the COVID-19 emergency and the State's ongoing response to the COVID-19 emergency situation,

the Commission. Order No. 37125 provides, in pertinent part to the instant Protective Order, that:

2. The Commission authorizes each of these Utilities to establish regulatory assets to record costs resulting from the suspension of disconnections. In future proceedings, to the extent any of these utilities request recovery of these costs, the Commission will consider whether each Utility's request for recovery of these regulatory assets is reasonable and necessary. The Commission will also consider in a future proceeding other issues, such as the appropriate period of recovery for the approved amount of regulatory assets, any amount of carrying costs thereon, any savings directly attributable to suspension of disconnects, and other related matters.

* * *

5. The Commission instructs any Utility that books regulatory assets consistent with the authorization provided in this Order to file a short (1-2) page report by May 20, 2020, regarding the Utility's financial condition.[]

6. Until otherwise ordered by the Commission, the Commission instructs any Utility that books regulatory assets consistent with the authorization provided in this Order, to also file a quarterly report, beginning on July 30, 2020, detailing the amounts of the costs incurred and any savings

and continues the disaster emergency relief period through May 31, 2020, unless terminated or extended by a separate proclamation. See "Seventh Supplementary Proclamation Related to the COVID-19 Emergency," available at: <https://governor.hawaii.gov/wp-content/uploads/2020/05/2005024-ATG-Seventh-Supplementary-Proclamation-for-COVID-19-distribution-signed-1.pdf>. The Governor's first Emergency Proclamation for COVID-19 was issued on March 5, 2020, available at: <https://governor.hawaii.gov/wp-content/uploads/2020/03/2003020-GOV-Emergency-Proclamation-COVID-19.pdf>.

realized, which have been booked to the regulatory assets. . . .³

* * *

In Ordering Paragraph No. 5 at n.9, the Commission notes its intention to issue a non-docket Protective Order to govern the Utilities' filing of any confidential financial or business information included in a Utility's Financial Condition Report and a Utility's Quarterly Report filed pursuant to Order No. 37125, provided that:

. . . consistent with [Uniform Information Practices Act], all information for which a Utility claims confidentiality is supported by a description that: (1) identifies in reasonable detail the information's source, character, and location; (2) states clearly the basis for the claim of confidentiality; and (3) describes, with particularity, the cognizable harm to the filing party from any misuse or unpermitted public disclosure of the information, which the Commission will review.⁴

³Order No. 37125, at 5-6 (footnotes omitted). See Ordering Paragraph No. 5 for the filing requirements of the Utility's financial condition report due by May 20, 2020 ("Financial Condition Report"), and Ordering Paragraph No. 6 for the filing requirements for the Utility's quarterly reports due beginning on July 30, 2020 ("Quarterly Report").

⁴Order No. 37125, at 6 n.9. See also, Commission Order No. 34521, "Addressing Hawaiian Electric Company, Inc.'s Motion for Clarification and/or Partial Reconsideration of Order No. 34367; Instructing Hawaiian Electric Company, Inc. to Supplement Its February 22, 2017, Confidential Filings; and Proposing Modifications to Order No. 34367," filed on May 2, 2017 in Docket No. 2016-0328 ("Order No. 34521"), at 4 (footnote omitted). Order No. 34521 relates to, among other things, the timing and requirements for designating confidential

The Commission recognizes that the public disclosure of certain confidential financial or business information contained in a Utility's Financial Condition Report and/or a Utility's Quarterly Report, as well as other materials filed with the Commission, could be disadvantageous to the subject Utility by disclosing to the Utility's respective competitors, information regarding the Utility's operations.

Thus, the Commission issues this Protective Order, as set forth below, to govern the classification, acquisition, and use of trade secrets, and other confidential information produced in each Utility's respective non-docketed Financial Condition Report and Quarterly Report and other reports and materials filed pursuant to Order No. 37125.

The Commission restates and instructs that for each redaction, the Utility must demonstrate that its confidential filings may be withheld from disclosure under the Uniform Information Practices Act ("UIPA"), and individually comply with Paragraph No. 5, below, and "(1) identify, in reasonable detail, the information's source, character, and location; (2) state clearly the basis for the claim of confidentiality;

information under a protective order issued by the Commission in a docket.

and (3) describe, with particularity, the cognizable harm to [it], from any misuse or unpermitted disclosure of the information.”⁵

II.

TERMS

A.

General Provisions

1. This Protective Order governs the classification, acquisition, and use of trade secrets, and other confidential information which may be produced by the Utility in this non-docketed matter. The Utility and the Consumer Advocate shall follow these procedures as applicable.

2. The Utility and the Consumer Advocate shall be subject to this Protective Order and shall be entitled to all confidential information under the provisions of said Order to the extent allowed by the commission.

B.

Application Of The Uniform Information Practices Act

3. To the extent that any of the documents covered by this Protective Order consist of “government records,” as defined

⁵See Order No. 34521 at 4 (footnote omitted).

in Hawaii Revised Statutes ("HRS") § 92F-3, the provisions of HRS Chapter 92F, the Uniform Information Practices Act ("UIPA"), shall apply to the disclosure of information contained in such documents. In the event that any provision of this Protective Order conflicts with any provision of the UIPA, the UIPA shall control.

C.

Designation Of Confidential Information

4. Any information that the Utility believes, in good faith, is confidential, including, but not limited to, trade secrets, research, development information, commercial information, customer usage, financial information, vendor information, bid information, cost support studies, service forecasts, or other information, may be designated as "confidential information" pursuant to the terms of this Protective Order. Such confidential information shall be protected against disclosure to a non-qualified person pursuant to the terms of this Protective Order, unless such information is declassified or permission to disclose the information to such non-qualified person is granted by the Utility, as provided in paragraph 15 below.

5. If the Utility seeks to designate information, whether written, oral, electronic, or in some other form, as confidential information, it shall notify the Commission and the Consumer Advocate that the information includes confidential information. The Utility must: (1) identify, in reasonable detail, the information's source, character, and location; (2) state clearly the basis for the claim of confidentiality; and (3) describe, with particularity, the cognizable harm to the Utility from any misuse or unpermitted disclosure of the information.

6. If the Utility designates information as confidential information, it shall provide the confidential information in accordance with the procedures described in paragraphs 13 through 15, as applicable (Section II.D, Disclosure To Qualified And Non-Qualified Persons).

7. If the Consumer Advocate challenges the claim of confidentiality for all or any of the information, the Utility shall bear the burden of proof in supporting its claim that the information is confidential. The Commission shall determine whether the information shall continue to be designated as confidential pursuant to the terms of this Protective Order. Any challenge to a claim that certain information is confidential shall be made in accordance with paragraph 26 below. Any challenge

to a claim of confidentiality asserted by the commission will be made upon its own motion.

8. Confidential information provided to the Commission or the Consumer Advocate, orally, electronically, or in any form other than written form, shall be protected as fully as confidential information provided in written form.

9. All information claimed to be confidential information shall be subject to the terms of this Protective Order, and it shall be treated as confidential information by all qualified persons (as defined by this Protective Order). Unless a different treatment is warranted, any notes, summaries, abstracts, or analyses that are prepared by counsel, experts, or other qualified persons, and that reflect the underlying confidential information, shall also be subject to the terms of this Protective Order.

10. Information that has been designated as confidential information pursuant to the terms of this Protective Order shall conspicuously display on each page, or communicate as otherwise appropriate, the following legend:

**CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER**

Whenever only a portion of the information is deemed to contain confidential information, the claim of confidentiality, to the extent reasonably practicable, shall be limited to only such

portion. However, if such limitation is not reasonably practicable, the information in total may be designated as confidential information.

11. With respect to any confidential information that is not under the control of the Utility, other persons shall, to the extent requested by the Utility, cooperate to ensure that all copies of such confidential information bear the legend required in paragraph 10 above.

12. The Utility may request that the Commission designate as confidential any information previously produced but not designated as confidential, provided that it, in the manner provided in paragraph 5 above, specifies the subject-matter of such confidential information, the basis for the claim of confidentiality, and the cognizable harm from any misuse or unpermitted disclosure of the information. In addition, the Utility shall substitute the previously produced but not designated as confidential material with the identical material under designation as required in Paragraph 10 above.

D.

Disclosure To Qualified And Non-Qualified Persons

13. Except as provided in paragraph 15 below, confidential information shall not be made available or disclosed

to any person who is not a "qualified person" as defined in paragraph 14 below.

14. "Qualified person," as used in this Protective Order, means any one of the following:

- (a) The author, addressee, or originator of the confidential information, i.e., the Utility, and its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has retained in this non-docketed matter (including any persons employed by such consultants);
- (b) The Commission, its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has retained in this non-docketed matter (including any persons employed by such consultants);
- (c) The Consumer Advocate, its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has

retained in this non-docketed matter (including any persons employed by such consultants);

- (d) Any other person approved by the Utility; and
- (e) Subject to the terms of this Protective Order, and to the extent allowed by the Commission, any other person designated as a qualified person by order of the Commission.

15. When a qualified person wishes to disclose confidential information to a non-qualified person, the qualified person must request permission from the Utility. The request shall: (a) identify the non-qualified person to whom disclosure is desired; (b) disclose any past, present, or anticipated affiliation between the qualified person and the non-qualified person; (c) specify the exact information to be disclosed; and (d) state the reasons for disclosure. If permission is granted by the Utility, disclosure of the confidential information shall be limited strictly to confidential information covered by the permission granted and shall be made to such non-qualified person in the same manner as provided for qualified persons in paragraph 16 below.⁶

⁶The requirements set forth in paragraph 16 shall not apply to: (a) the Commission, its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has retained in this non-docketed matter (including any persons employed by such

E.

Procedure For Obtaining Access

16. Prior to disclosing confidential information to a qualified person (other than the persons identified in paragraphs 14(b) and 14(c) herein, i.e., the Commission and the Consumer Advocate), if any, the qualified person shall read a copy of this Protective Order, complete a copy of the "Protective Agreement" attached as Exhibit A to this Protective Order, and sign the completed copy of the Protective Agreement. A copy of the executed Protective Agreement shall be filed with the Commission and served on the Consumer Advocate and the Utility.

F.

Use Of Confidential Information

17. Any confidential information obtained under this Protective Order shall be used solely in connection with this non-docketed matter and any related administrative and judicial proceedings (at which time the information shall continue to be

consultants); or (b) the Consumer Advocate, its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has retained in this non-docketed matter (including any persons employed by such consultants).

treated as confidential), and shall not be used for any other purpose, including business, governmental or commercial purposes, or in any other administrative or judicial proceeding, except as provided in paragraphs 18 and 19, and except as may be directed by: (a) an order of any court, agency, or other entity having jurisdiction; (b) an order of the Commission; or (c) the UIPA, including any ruling of the Office of Information Practices.

18. Notwithstanding paragraph 17 above, any confidential information obtained under this Protective Order may be used by the Commission, its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has retained in this non-docketed matter (including any persons employed by such consultants), in any proceeding pending before the commission involving the Consumer Advocate or the Utility, or where the intended use of such confidential information is for the purpose of assisting the Commission in fulfilling its statutory duties and responsibilities. The confidential information shall continue to be treated as confidential until the protection conferred by this Protective Order (or any other applicable Protective Order) is terminated by the Utility, or by further order of the Commission.

19. Any confidential information obtained under this Protective Order may be used by the Consumer Advocate, its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has retained in this non-docketed matter (including any persons employed by such consultants), in any proceeding pending before the Commission involving the Utility, or where the intended use of such confidential information is for the purpose of assisting the Consumer Advocate in fulfilling its statutory duties and responsibilities. The confidential information shall continue to be treated as confidential until the protection conferred by this Protective Order (or any other applicable Protective Order) is terminated by the Utility, or by further order of the Commission.

20. Unless otherwise ordered by the Commission, with respect to any written testimony, exhibits, or pleadings that contain or reflect the confidential information, only that part of the written testimony, exhibits, or pleadings containing or reflecting such information shall be treated as confidential, and the part of a hearing, if any, at which such confidential information is discussed shall be held in camera or under other conditions imposed by the Commission to prevent unnecessary public disclosure of such confidential information. A copy of any such

written testimony, exhibits, or pleadings, with any such confidential information deleted therefrom, shall be included in the public record, and shall contain the following designation in the upper left-hand corner of the page or conspicuously placed as otherwise appropriate:

**Confidential Information
Deleted Pursuant To
Protective Order No. _____**

G.

Retention Of Confidential Information

21. Confidential information shall be retained in a locked cabinet dedicated to the storage of confidential information, or otherwise secured to ensure that access to and disclosure of the confidential information is limited to a qualified person.

22. Confidential information that is provided to or filed with the Commission, its staff, its counsel, any outside counsel it has retained in this non-docketed matter (including any persons employed by such counsel), and any consultants it has retained in this non-docketed matter (including any persons employed by such consultants) shall be separately bound and placed in a sealed envelope or other appropriate sealed container on which the following legend shall be conspicuously displayed:

THIS ENVELOPE IS SEALED PURSUANT TO PROTECTIVE ORDER NO. _____ AND CONTAINS DOCUMENTS WITH CONFIDENTIAL INFORMATION. IT IS NOT TO BE OPENED OR THE CONTENTS OF THIS ENVELOPE DISPLAYED OR REVEALED EXCEPT TO QUALIFIED PERSONS AUTHORIZED TO INSPECT THE ENCLOSED DOCUMENTS.

23. Confidential information shall not be reproduced or duplicated, except to make working copies and copies to be filed with the Commission under seal. If a document contains information so sensitive that it should not be copied by anyone, it shall bear the following legend: "Copying Prohibited."

24. If a court, administrative agency, or other entity having jurisdiction requests, subpoenas, or orders production of confidential information that has been obtained under this Protective Order, the Utility shall immediately be notified of the request, subpoena, or order. In addition, both the Commission and the Consumer Advocate shall be immediately notified of the request, subpoena, or order.

H.

Duration Of Confidentiality

25. The confidentiality of the information produced pursuant to this Protective Order shall be preserved until termination pursuant to an appropriate stipulation or by further order of the Commission.

I.

Appeal To The Commission

26. If the Consumer Advocate disagrees with the designation of information as confidential, the Utility shall first make a good faith attempt to resolve the dispute on an informal basis. If the dispute cannot be resolved, the Consumer Advocate shall file a motion to compel disclosure or other appropriate motion with the Commission. The Utility shall bear the burden of proof in supporting its claim, and the Commission shall determine whether the information shall continue to be designated as confidential under this Protective Order. The Commission may, on its own motion, require the Utility to support its claim. Pending disposition of any such motion, the information in question shall be treated as confidential information and shall not be disclosed except as permitted by this Protective Order.

J.

Non-Waiver Of Objections And Rights

27. The Consumer Advocate and the Utility retain the right to contest any assertion or finding of confidentiality or of non-confidentiality. Nothing in this Protective Order shall

prevent the Consumer Advocate or the Utility from objecting to requests for production of information or other discovery request.

28. The Consumer Advocate and the Utility have the right to question, challenge, and object to the admissibility of confidential information on the grounds of relevancy or materiality.

K.

Modification Of The Protective Order

29. The Commission may modify this Protective Order on the motion of the Consumer Advocate or the Utility, or on its own motion, upon reasonable notice and an opportunity to respond to such motion. The Commission may also modify this Protective Order upon receipt and approval of a written stipulation filed by the Consumer Advocate and the Utility.

L.

Disposal Of Confidential Information

30. Except as provided in paragraphs 31 and 32 below, within ninety (90) days after the conclusion of this non-docketed matter, persons in possession of confidential information shall, at the option of the Utility, return or destroy all such materials and all copies, notes, tapes, papers, or other medium containing,

summarizing, excerpting, or otherwise embodying any confidential information. If the Utility requests destruction, the person destroying the information shall certify its destruction to the producing person, indicating the name of the person destroying the documents, the method of destruction, and the identity of the specific documents destroyed.

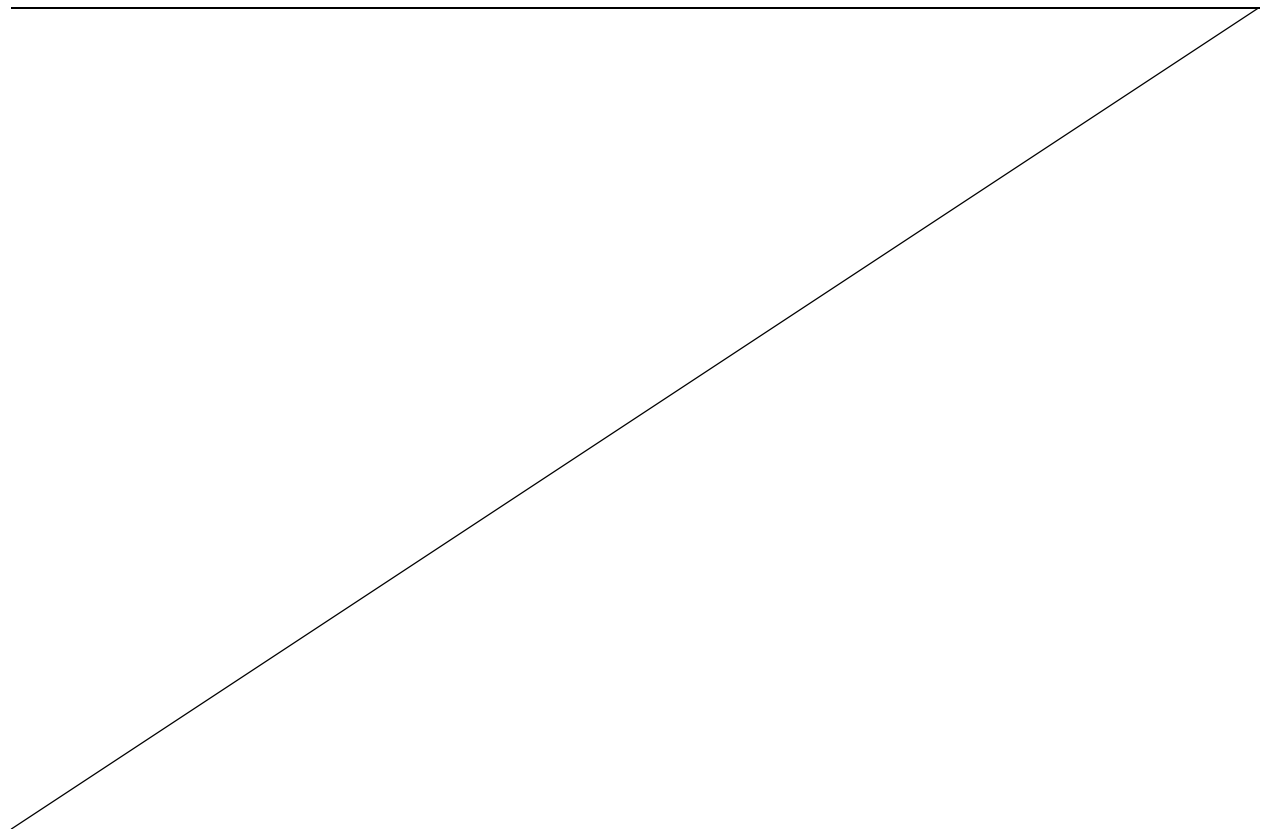
31. Counsel and representatives of record for the Consumer Advocate and the Utility shall be entitled to retain memoranda, pleadings, exhibits of record, written testimony, and transcripts embodying information derived from or incorporating confidential information to the extent reasonably necessary to preserve files associated with this non-docketed matter. The files shall not be disclosed to any other person.

32. Confidential information produced in this non-docketed matter shall remain in the possession of the Commission and the Consumer Advocate for the period required by applicable statutes, rules, and administrative directives, or as designated by the Commission, whichever is longer.

M.

Sanctions

33. Any person violating this Protective Order shall be subject to such sanctions as are consistent with applicable law and other authority.



III.

ORDERS

THE COMMISSION ORDERS that the Terms set forth in Section II of this Protective Order shall govern the classification, acquisition, and use of trade secrets, and other confidential information produced in this non-docketed matter and filed pursuant to Order No. 37125.

DONE at Honolulu, Hawaii MAY 15, 2020.

PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By James P. Griffin
James P. Griffin, Chair

By Jennifer M. Potter
Jennifer M. Potter, Commissioner

By Leodoloff R. Asuncion, Jr.
Leodoloff R. Asuncion, Jr., Commissioner

APPROVED AS TO FORM:

Mark Kaetsu
Mark Kaetsu
Commission Counsel

Non-Docketed Protective Order.ljk

EXHIBIT A

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

PROTECTIVE AGREEMENT

1. I, _____, have been presented with a copy of Protective Order No. _____ issued by the Hawaii Public Utilities Commission on the _____ day of _____, 2020 ("Protective Order").

2. I am employed, retained or assisting _____ and have requested review of the confidential information covered by the Protective Order.

3. I understand the confidential information covered by the Protective Order is to be used solely to assist _____ and that unless otherwise permitted by the Protective Order, I am to make no other use of the confidential information, nor am I to disclose the confidential information to any other person.

4. I further understand that at the conclusion of my assistance to _____, I shall account for each copy, extract, note and summary of, or other document containing any part of such confidential information to the party claiming confidentiality and I shall abide by the provisions in paragraph 30 of the Protective Order, unless otherwise permitted by paragraph 31 of the Protective Order.

5. I hereby certify that I have read the above-mentioned Protective Order and agree to abide by its terms and conditions.

DATED at: _____, _____, this _____, _____.
(City) (State) (Date)

Signature

Address

(____) _____
Telephone Number

CERTIFICATE OF SERVICE

Pursuant to Order No. 37043, the foregoing order was served on the date of filing by electronic mail addressed to the following parties:

DEAN NISHINA
EXECUTIVE DIRECTOR
DEPARTMENT OF COMMERCE AND
CONSUMER AFFAIRS
DIVISION OF CONSUMER ADVOCACY
dnishina@dcca.hawaii.gov

KEVIN M. KATSURA
DIRECTOR, REGULATORY NON-RATE
PROCEEDINGS
HAWAIIAN ELECTRIC COMPANY, INC.
HAWAI'I ELECTRIC LIGHT COMPANY,
INC.
MAUI ELECTRIC COMPANY, INC.
kevin.katsura@hawaiianelectric.com

BRANDEE HOLT
REGULATORY AFFAIRS MANAGER
KAUAI ISLAND UTILITY COOPERATIVE
B.Holt@kiuc.coop

TOM KOBASHIGAWA
DIRECTOR, REGULATORY AFFAIRS
THE GAS COMPANY, LLC
dba HAWAI'I GAS
skobashi@hawaiiigas.com

STEVEN P. GOLDEN
HAWAIIAN TELCOM, INC.
steven.golden@hawaiiantel.com

JANICE L. ONO
AREA MANAGER - REGULATORY
AT&T CORP.
Janice.Ono@att.com

MARY GARRIS
LEVEL 3 COMMUNICATIONS, LLC
mary.garris@centurylink.com

BREANNE KAHALEWAI
PRESIDENT
SANDWICH ISLES COMMUNICATIONS,
INC.
abbyt@sandwichisles.com

JOSEPH O'HARA,
ASSISTANT TREASURER
COMMON POINT LLC
regulatoryaffairs@anpisolutions.com

DANIEL MELDAZIS
ONVOY, LLC
taxdepartment@inteliquent.com

ANDREW M. LANCASTER
MANAGER
SPRINT COMMUNICATIONS COMPANY
L.P.
Andy.M.Lancaster@sprint.com

Certificate of Service
Page 2

MIKE METHVIN
TAX DIRECTOR
SPOK, INC.
matt.ford@spok.com

ROBERT CLEARY
VICE PRESIDENT
800 RESPONSE INFORMATION
SERVICES LLC
bcleary@800response.com

SCOTT ALLEN
CHIEF FINANCIAL OFFICER
ACCESSLINE COMMUNICATIONS
CORPORATION
dba VOICE TELCO SERVICES
sdesgrouilliers@intermedia.net

JOSEPH T. KOPPY
CHIEF FINANCIAL OFFICER
AFFINITY NETWORK INCORPORATED
jrenneker@nos.com

ANDRE SIMONE
CHIEF FINANCIAL OFFICER
AIRUS, INC.
asimone@intelepeer.com

JUDITH A RILEY
ANPI BUSINESS, LLC
jriley@telecompliance.net

LISA JILL FREEMAN
VP & REGULATORY COMPLIANCE
OFFICER
BANDWIDTH.COM CLEC, LLC
ljfreeman@bandwidth.com

KATHLEEN GOREY, REGULATORY
MANAGER
BCN TELECOM, INC.
(FACILITIES-BASED)
kgorey@bcntele.com

JACOB PETROSKY
MANAGER
808PHONE.COM LLC
jacob@808phone.com

ACN COMMUNICATIONS SERVICES, LLC
mark@csilongwood.com

AIRESRING, INC.
cat@airespring.com

TAMMY FERBER
CONTROLLER
AMERIVISION COMMUNICATIONS, INC.
tferber@affinity4.com

JOSEPH O'HARA
CHIEF FINANCIAL OFFICER
ANPI, LLC
johara@anpisolutions.com

KATHLEEN GOREY
REGULATORY MANAGER
BCN TELECOM, INC. (COA)
kgorey@bcntele.com

REBECCA WEST
STAFF MANAGER
BROADVIEW NETWORKS, INC.
becky.west@windstream.com

Certificate of Service
Page 3

SUSAN RAPINZ
REGULATORY MANAGER
BROADVOX-CLEC, LLC
info@inteserra.com

KATE O'CONNOR
CHIEF FINANCIAL OFFICER
BUEHNER-FRY, INC.
MBCoker@TheNavisWay.com

MARY GARRIS
CENTURYLINK COMMUNICATIONS, LLC
mary.garris@centurylink.com

RICHARD MINEROINO
COMTECH 21, LLC
regulatory@comtech21.com

JEFF KORN
CHIEF LEGAL OFFICER
CREXENDO BUSINESS SOLUTIONS,
INC.
jkorn@storesonline.com

DAVID H. BARKSDALE
CHIEF FINANCIAL OFFICER
CUSTOM TELECONNECT, INC.
bperna@customteleconnect.com

MENDEL BIRNBAUM
VICE PRESIDENT
DYNALINK COMMUNICATIONS, INC.
mendel@dynalinktel.com

MARY GARRIS
BROADWING COMMUNICATIONS, LLC
mary.garris@centurylink.com

GINO CAPOZZI
TAX AND REGULATORY COMPLIANCE
MANAGER
CALLCATCHERS INC.
dba FREEDOMVOICE SYSTEMS
compliance@freedomvoice.com

WENDY HEE
PRESIDENT
CLEARCOM, INC.
abbyt@sandwichisles.com

JOSEPH A. NICOTRA
PRESIDENT
CONSUMER TELCOM, INC.
abloom@idxx.com

FERNANDA BIEHL
CROWN CASTLE NG WEST LLC
PUC.Correspondence@crowncastle.com

REBECCA WEST
STAFF MANAGER
DELTACOM, LLC
dba EARTHLINK BUSINESS I
becky.west@windstream.com

ROBERT MOCAS
PRESIDENT
EASTON TELECOM SERVICES, LLC
smacke@eastontelecom.com

GINA LAWRENCE
eNETWORKS, LLC
gina.lawrence@essentia-inc.com

Certificate of Service
Page 4

DANIEL I. TIMM
CHIEF FINANCIAL OFFICER
EXTENET SYSTEMS, INC.
compliance@util.extenetsystems.com

JOSEPH TOPEL
REGULATORY MANAGER
FRANCE TELECOM CORPORATE
SOLUTIONS L.L.C. (COA)
joe.topel.ext@orange.com

ELENA THOMASSON
FUSION CLOUD SERVICES, LLC
elena.thomasson@fusionconnect.com

MARY GARRIS
GLOBAL CROSSING
TELECOMMUNICATIONS, INC.
mary.garris@centurylink.com

GINO CAPOZZI
GODADDY.COM, LLC
gcapozzi@godaddy.com

KIM MCNEANY
ELECTRIC LIGHTWAVE LLC
dba INTEGRA TELECOM
kim.mcneany@allstream.com

JERRY WEIKLE, REGULATORY
ENTELEGENT SOLUTIONS, INC.
dba ENTELEGENT COMMUNICATIONS
SOLUTIONS
regulatory@entelegent.com

JEFF GIANNANTONIO
FIRST COMMUNICATIONS, LLC
jgiannantonio@firstcomm.com

JESSICA MATUSHEK
DIRECTOR ACCOUNTING
FRONTIER COMMUNICATIONS OF
AMERICA, INC.
jessica.matushek@ftr.com

DAN KARDATZKE
CHIEF FINANCIAL OFFICER
GC PIVOTAL, LLC
regulatory@globalcapacity.com

GLOBAL TEL*LINK CORPORATION
scockerham@telecompliance.net

JOHN PRINNER
GRANITE TELECOMMUNICATIONS, LLC
taxdept@granitenet.com

BRIAN KENNEY
GRASSHOPPER GROUP, LLC
brian.kenney@logmein.com

JARED GRUGETT
PRESIDENT
HAWAII DIALOGIX TELECOM, LLC
jgrugett@hawaiidt.com

CARL BILLEK
SENIOR REGULATORY COUNSEL
IDT AMERICA, CORP.
carl.billek@idt.net

KEN DAWSON
DIRECTOR
INMATE CALLING SOLUTIONS, LLC
dba ICSOLUTIONS
scastillo@icsolutions.com

Certificate of Service
Page 5

MIKE CUMPTON
CONTROLLER
INTELLICALL OPERATOR SERVICES,
INC.
mark@csilongwood.com

RICHARD JOHNSON
MANAGER, REGULATORY AFFAIRS
INTRADO SAFETY COMMUNICATIONS,
INC.
[regulatory.safetyservices@intrad
o.com](mailto:regulatory.safetyservices@intrad
o.com)

MARY GARRIS
LEVEL 3 COMMUNICATIONS, LLC
mary.garris@centurylink.com

JOHN NELSON, PRESIDENT
HAMILTON RELAY, INC.
john.nelson@hamiltontel.com

THOMAS PAOLUCCI
CONTROLLER
HAWAIIAN TELCOM SERVICES
COMPANY, INC. (COA)
Tom.Paolucci@cinbell.com

INCONTACT, INC.
compliance@niceincontact.com

CINDY FOSTER
DIRECTOR
INTELLETRACE, INC.
support@intellextrace.com

LESLIE BEACH, TAX ACCOUNTANT
INTERNATIONAL TELECOM, LTD.
leslieb@kall8.com

LEGACY LONG DISTANCE
INTERNATIONAL, INC.
dba LEGACY INMATE
COMMUNICATIONS
brian@edovo.com

ALEX VALENCIA
VICE PRESIDENT OF COMPLIANCE &
REGULATORY AFFAIRS
LINGO TELECOM OF THE WEST, LLC
dba BIRCH COMMUNICATIONS
alex.valencia@lingo.com

SHANNON BROWN
MCI COMMUNICATIONS SERVICES,
INC.
dba VERIZON BUSINESS SERVICES
shannon.brown@verizon.com

RALPH DICHY
DIRECTOR OF TAX AFFAIRS
METROPOLITAN TELECOMMUNICATIONS
OF HAWAII, INC.
dba METTEL
rdichy@mettel.net

KAREN HYDE
MOBILITIE, LLC
kmh@compliancegroup.com

JIM MCCABE
VICE PRESIDENT OF OPERATIONS
NETWORK INNOVATIONS, INC.
dba NITEL
jriley@telecompliance.net

DANIEL MELDAZIS
NEUTRAL TANDEM-HAWAII, LLC
taxdepartment@inteliquent.com

Certificate of Service
Page 6

ALEX VALENCIA
VICE PRESIDENT
MATRIX TELECOM, LLC
dba MATRIX BUSINESS
TECHNOLOGIES,
dba TRINSIC COMMUNICATIONS,
dba VARTEC TELECOM,
dba EXCEL TELECOMMUNICATIONS,
dba CLEAR CHOICE COMMUNICATIONS
alex.valencia@lingo.com

SHANNON BROWN
MCI METRO ACCESS TRANSMISSION
SERVICES, LLC
dba VERIZON ACCESS TRANSMISSION
SERVICES
shannon.brown@verizon.com

KAREN HYDE
MOBILITIE MANAGEMENT, LLC
kmh@compliancegroup.com

WILLIAM L. POPE
PRESIDENT
NETWORK COMMUNICATIONS
INTERNATIONAL CORP.
dba NCIC INMATE COMMUNICATIONS
stephanie.jackson@ncic.com

AMANDA HUTCHISON HARRIS
REGULATORY COMPLIANCE OFFICER
NETWORKIP, LLC
regulatory@networkip.net

GLEN NELSON
VICE PRESIDENT
NEW HORIZONS COMMUNICATIONS
CORP.
gnelson@nhcgrp.com

SUSAN ORNSTEIN
NEXTGEN COMMUNICATIONS, INC.
SST-Compliance@comtechtel.com

JOSEPH T. KOPPY
CHIEF EXECUTIVE OFFICER
NOS COMMUNICATIONS, INC.
jrenneker@nos.com

MARK LEAFSTEDT
CHIEF EXECUTIVE OFFICER
OPEX COMMUNICATIONS, INC.
dba TCI LONG DISTANCE
regulatory@opexld.com

SHARON E. PORTER
PNG TELECOMMUNICATIONS, INC.
dba POWERNET GLOBAL
COMMUNICATIONS
dba CROSSCONNECT
tax@powernetco.com

INNA VINOGRADOV
QUANTUMSHIFT COMMUNICATIONS,
INC.
dba VCOM SOLUTIONS
inna@icommlaw.com

THOMAS P. MARGAVIO
SBC LONG DISTANCE, LLC
dba SBC LONG DISTANCE
dba AT&T LONG DISTANCE
tm5886@att.com

RICHARD ZHENG
PRESIDENT
SERVPAC INCORPORATED
rzheng@servpac.com

Certificate of Service
Page 7

TODD LESSER
PRESIDENT
NORTH COUNTY COMMUNICATIONS
CORPORATION
nccpuc@nccom.com

OPERATOR SERVICE COMPANY, LLC
regcompliance@telecompliance.net

JOHN DAY
PRESIDENT
PACIFIC DATA SYSTEMS
dba NEXGEN NETWORK SERVICES
john@pdsquam.com

PUBLIC COMMUNICATIONS SERVICES,
INC.
scockerham@telecompliance.net

DAVID RODMAN
PRESIDENT
RED ROAD TELECOM, LLC
david@redroad.com

MICHAEL S.J. LOZICH
CORPORATE COUNSEL
DIRECTOR OF REGULATORY & GOVT.
AFFAIRS
SECURUS TECHNOLOGIES, INC.
mlozich@securustechnologies.com

SQF, LLC
nbournakel@tilsontech.com

REBECCA WEST
TALK AMERICA, INC.
dba CAVALIER TELEPHONE
dba PAETEC BUSINESS SERVICES
becky.west@windstream.com

BARBARA MONTE
TELEPORT COMMUNICATIONS AMERICA,
LLC
bm2571@att.com

SUSAN COCKERHAM
TIME CLOCK SOLUTIONS, LLC
scockerham@telecompliance.net

HEATHER DOBSON
TIME WARNER CABLE INFORMATION
SERVICES (HAWAII), LLC
dba TIME WARNER CABLE
heather.dobson@charter.com

ROBERT YOUNG
PRESIDENT
U.S. TELECOM LONG DISTANCE, INC.
abloom@ldxx.com

SUSAN COCKERHAM
VELOCITY THE GREATEST PHONE
COMPANY EVER, INC.
scockerham@telecompliance.net

VERIZON LONG DISTANCE LLC
dba VERIZON LONG DISTANCE
regacct@verizon.com

JANE OMAN
TDS LONG DISTANCE CORPORATION
(COA)
finance@tdstelecom.com

DAVID ALDWORTH
PRESIDENT
TELIAX, INC.
daldworth@teliax.com

Certificate of Service
Page 8

HEATHER DOBSON
TIME WARNER CABLE BUSINESS LLC
heather.dobson@charter.com

MARK LEAFSTEDT
CEO
TOTAL HOLDINGS INC.
dba GTC COMMUNICATIONS
legal@mygtc.com

SUSAN COCKERHAM
VALUE-ADDED COMMUNICATIONS, INC.
scockerham@telecompliance.net

PATRICE DEMARCO
VERIZON HAWAII INTERNATIONAL,
INC.
patrice.demarco@verizon.com

DEISY CARRERA
VERIZON SELECT SERVICES, INC.
deisy.carrera@verizon.com

KEITH CUMMINGS, VP
VOICECOM TELECOMMUNICATIONS, LLC
mark@csilongwood.com

ANDREW NICKERSON
DIRECTOR
WIDE VOICE, LLC
erlae@widevoice.com

WIMACTEL, INC.
dba INTELICAL OPERATOR
SERVICES OF NORTH AMERICA
jmackenzie@wimactel.com

JANICE CRUMP
CHIEF FINANCIAL OFFICER
WORKING ASSETS FUNDING SERVICE,
INC.
dba CREDO LONG DISTANCE
compliance@wafs.com

SHARON ADAMS
GOVERNMENT RELATIONS ANALYST
XO COMMUNICATIONS SERVICES, LLC
sharon.e.adams@verizon.com

THOMAS PAOLUCCI
CONTROLLER
WAVECOM SOLUTIONS CORPORATION
Tom.Paolucci@cinbell.com

MARY GARRIS
WILTEL COMMUNICATIONS, LLC
mary.garris@centurylink.com

REBECCA WEST
WINDSTREAM COMMUNICATIONS, LLC
becky.west@windstream.com

MARK PAVOL
X2COMM, INC.
dba DC COMMUNICATIONS
mark@x2comm.com

MARK PAVOL
REGULATORY MANAGER
YMAX COMMUNICATIONS CORP.
regulatory@ymaxcorp.com

ACCESS POINT, INC.
mike.winston@gtt.net

Certificate of Service
Page 9

MARK HAMILTON
AVAYA CLOUD INC.
markhamilton@avaya.com

BOOMERANG WIRELESS, LLC
dba ENTOUCH WIRELESS
jrcarter@readywireless.com

RAYMOND VALME
DIAL WORLD COMMUNICATIONS, LLC
ray@dialworldcom.com

MARK LAMMERT
FLASH WIRELESS, LLC
mark@csilongwood.com

LANCE STEINHART
GLOBAL CONNECTION INC. OF
AMERICA
dba STANDUP WIRELESS
info@telecomcounsel.com

JOHN PRINNER
GRANITE TELECOMMUNICATIONS, LLC
(COR)
taxdept@granitenet.com

CURTIS CHURCH
AMERICAN BROADBAND AND
TELECOMMUNICATIONS COMPANY
cchurch@ambt.net

BCN TELECOM, INC. (COR)
contact@nationwideregulatorycompliance.com

SHANE BRIDGES
CONTROLLER
CONSUMER CELLULAR, INCORPORATED
tax@consumercellular.com

ALISON MINEA
DISH WIRELESS L.L.C.
alison.minea@dish.com

JOE TOPEL
REGULATORY MANAGER
FRANCE TELECOM CORPORATE
SOLUTIONS L.L.C. (COR)
joe.topel@orange.com

JARAD BACKLUND
BUSINESS CONTROLLER
GOOGLE NORTH AMERICA INC.
fi-compliance@google.com

THOMAS PAOLUCCI
CONTROLLER
HAWAIIAN TELCOM SERVICES
COMPANY, INC. (COR)
Tom.Paolucci@cinbell.com

HELLO MOBILE TELECOM LLC
req@qlinkmobile.com

SAM OLAWAIYE
INREACH INC.
tax.dept@garmin.com

MASAHIRO FURUYA
EXECUTIVE VP
KDDI AMERICA, INC.
ga@kddia.com

AMY RAY
METROPCS CALIFORNIA, LLC
Taxops@T-Mobile.com

Certificate of Service
Page 10

GENNARO ISABELLA
SENIOR TAX ANALYST
ONSTAR, LLC
tamika.mayes@gm.com

JOSE L. SOLANA
PRESIDENT
PINNACLE TELECOMMUNICATIONS
GROUP, LLC
joe@gsaudits.com

PURETALK HOLDINGS, LLC
mark@csilongwood.com

PAUL LAPIER
IM TELECOM, LLC
dba INFINITI MOBILE
plapier@infinitimobile.com

LISA WILLIS
K G COMMUNICATIONS, INC.
lisa@kgcomm.net

LUNAR LABS, INC.
info@joinlunar.com

MITEL CLOUD SERVICES, INC. (COR)
scockerham@telecompliance.net

GLENN P. STORY
CHIEF FINANCIAL OFFICER
PATRIOT MOBILE, LLC
glenn@eoscell.com

RICHARD PELLY
PLINTRON TECHNOLOGIES USA LLC
richardpelly@plintronamericas.com
m

READY WIRELESS, LLC
dba AFFINITY CELLULAR
dba CLUB CELLULAR
jrcarter@readywireless.com

REPUBLIC WIRELESS, INC.
regulatory@republicwireless.com

NATHAN JOHNSON
CHIEF EXECUTIVE OFFICER
SAGE TELECOM COMMUNICATIONS, LLC
dba TRUCONNECT
scockerham@telecompliance.net

HEATHER DOBSON
SPECTRUM MOBILE, LLC
taxregulatory@charter.com

STS MEDIA, INC.
dba FREEDOMPOP
orvin@gsaudits.com

ENRIQUE LANDIVAR
TELEFONICA USA, INC.
enrique.landivar@telefonica.com

ELENA THOMASSON
TEMPO TELECOM, LLC
elena.thomasson@birch.com

BETH BRANDENSTEIN
THE PEOPLE'S OPERATOR USA, LLC
beth@gsaudits.com

AMANDA GUCICH
ROK MOBILE, INC.
promano@rokmobile.com

Certificate of Service
Page 11

SELECTEL, INC.
dba SELECTEL WIRELESS
oflaherty.matt@gmail.com

DARRIN PFANNENSTIEL, ESQ.
STREAM COMMUNICATIONS, LLC
darrin.pfannenstiel@streamenergy.net

TACHIBANA ENTERPRISES, LLC
sli@tachibana.com

TELRITE CORPORATION
mark@csilongwood.com

EILEEN BAYERS
THE LIGHT PHONE, INC.
eileen@thelightphone.com

CHRISTINA MEYERING
TING INC.
cmeyering@tu cows.com

CHESLEY DILLION
VP - CORP. TAX
TRACFONE WIRELESS, INC.
dba SAFELINK WIRELESS
mmontenegro@tracfone.com

GARY JOSEPH
MANAGER
WIMACTEL, INC. (COR)
jmackenzie@goviiz.com

ANDREW M. LANCASTER
MANAGER
VIRGIN MOBILE USA, L.P.
andy.m.lancaster@sprint.com

JONATHON FRANCIS
WING TEL INC.
jonathon@wingalpha.com

SUSAN COCKERHAM
365 WIRELESS LLC
scockerham@telecompliance.net

STEVE DELGADO
CONSULTANT - TAX
CELLCO PARTNERSHIP
dba VERIZON WIRELESS
steve.delgado@gmail.com

GERALD GUARDIOLA
CRICKET WIRELESS LLC
gg009y@att.com

GERALD GUARDIOLA
NEW CINGULAR WIRELESS PCS, LLC
gg009y@att.com

WENDY HEE
PA MAKANI LLC
dba SANDWICH ISLES WIRELESS
wendyh@waimana.com

ANDREW M. LANCASTER
MANAGER
SPRINTCOM, INC.
dba SPRINT PCS
andy.m.lancaster@sprint.com

GARY FINKEL
ALLIANT TECHNOLOGIES, L.L.C.
gfinkel@allianttech.com

Certificate of Service
Page 12

KIRK IYAMA
COMCAST OTR1, LLC
kirk_iyama@cable.comcast.com

JAMES TATE
GENERAL MANAGER
EXCELLUS COMMUNICATIONS, LLC
jim.tate@seniortechllc.com

MARY T. BULEY
SENIOR REGULATORY MANAGER
ONVOY SPECTRUM, LLC
mary.buley@onvoy.com

ISSA ASAD
Q LINK WIRELESS LLC
issa@qlinkwireless.com

AMY RAY
T-MOBILE WEST LLC
dba T-MOBILE
Amy.Ray@T-Mobile.com

GARY GRINHAM
UVNV, INC.
dba MINT MOBILE
ggrinham@ultra.me

BLAIR ROSENTHAL
ASSISTANT GENERAL COUNSEL
VODAFONE US INC.
blair.rosenthal@vodafone.com

STEVE DELGADO
VISIBLE SERVICE LLC
steve.delgado@verizon.com

THOMAS SELBY, VICE PRESIDENT
ATC MAKENA WWTP SERVICES CORP.
tselby@makenagbc.com

LEE MANSFIELD, MANAGER
SARAH LEEPER, ESQ.
DEMETRIO A. MARQUEZ,
PARALEGAL IV
HAWAII - AMERICAN WATER COMPANY
(HAWAII KAI OPERATIONS)
lee.mansfield@amwater.com
sarah.leeper@amwater.com
demetrio.marquez@amwater.com

LEE MANSFIELD, MANAGER
SARAH LEEPER, ESQ.
DEMETRIO A. MARQUEZ,
PARALEGAL IV
HAWAII - AMERICAN WATER COMPANY
(MAUNA LANI OPERATIONS)
lee.mansfield@amwater.com
sarah.leeper@amwater.com
demetrio.marquez@amwater.com

ROBERT STOUT
ACCOUNTING MGR.
HAWAII WATER SERVICE COMPANY,
INC. - PUKALANI WASTEWATER
DISTRICT
rstout@hawaiiwaterservice.com

HOLLY GANDIA
HOH UTILITIES, LLC
holly@mskauai.com

PAULUS SUBRATA
VICE PRESIDENT
KAPALUA WASTE TREATMENT COMPANY
psubrata@mlpmaui.com

Certificate of Service
Page 13

JAY M. UYEDA
VP OF DEVELOPMENT
KAUPULEHU WASTE WATER COMPANY
juyeda@hualalairesort.com

ROBERT STOUT
KEAUHOU COMMUNITY SERVICES, INC.
Rstout@hawaiiwaterservice.com

LINDSAY CRAWFORD
SENIOR MANAGER OF PLANNING &
ENGINEERING
KUKUI'ULA SOUTH SHORE COMMUNITY
SERVICES LLC
lcrawford@kukuiula.com

GARRET TOKUDA
SENIOR VP, FINANCE
MANELE WATER RESOURCES, LLC
gtokuda@pulamalanai.com

LISA M. MARSH
MOSCO, INC.
tsvetin@molokairanch.com

JOSEPH GIANNINI
DIRECTOR-HOSPITALITY ACCOUNTING
TURTLE BAY WASTEWATER TREATMENT,
LLC
jgiannini@revantage.com

ROBERT STOUT
ACCOUNTING MGR.
WAIKOLOA SANITARY SEWER COMPANY,
INC.
dba WEST HAWAII SEWER COMPANY
Rstout@hawaiiwaterservice.com

CANDICE MEYER
WAIMEA WASTEWATER COMPANY, INC.
mey.c@pri-hi.com

JOHN K. NEWTON
AQUA PUHI, LLC
dba PUHI SEWER & WATER COMPANY
pswmail@aquaengineers.com

MITCH SILVER
KALAELOA WATER CO., LLC
alex.dosen@huntcompanies.com

ROBERT STOUT
ACCOUNTING MANAGER
KONA WATER SERVICE COMPANY, INC.
Rstout@hawaiiwaterservice.com

BRAD SUIZU
SECRETARY & MANAGER
PRINCEVILLE UTILITIES COMPANY,
INC.
bsuizu@princeville.com

SHARI SAKAMOTO
PUNALU'U WATER & SANITATION
CORP.
shari.sakamoto@robertshawaii.com

KISAN JO
SOUTH KOHALA WATER CORPORATION
d.hwang@princehawaii.com

ROBERT STOUT
ACCOUNTING MANAGER
WAIKOLOA RESORT UTILITIES, INC.
dba WEST HAWAII UTILITY COMPANY
Rstout@hawaiiwaterservice.com

Certificate of Service
Page 14

OLIVIA MAKI
HANA WATER SYSTEMS, LLC - SOUTH
omaki@biologicalcapital.com

OLIVIA MAKI
HANA WATERSYSTEMS, LLC - NORTH
omaki@biologicalcapital.com

ROBERT STOUT
ACCOUNTING MANAGER
HAWAII WATER SERVICE COMPANY,
INC. - KAA NAPALI OPERATION
Rstout@hawaiiwaterservice.com

KATHERINE DRAGO
PRESIDENT
HAWAIIAN BEACHES WATER COMPANY,
INC.
kateprescott78@hotmail.com

PAULUS SUBRATA
VICE PRESIDENT
KAPALUA WATER COMPANY
psubrata@mlpmaui.com

JAY M. UYEDA
VP OF DEVELOPMENT
KAUPULEHU WATER COMPANY
juyeda@hualairesort.com

JOHN R. ORD
CHIEF FINANCIAL OFFICER
KEALIA WATER COMPANY HOLDINGS
LLC
kealiamail@aquaengineers.com

TOM HITCH
PRESIDENT
KILAUEA IRRIGATION CO., INC.
tomahitch@earthlink.net

WILLIAM L. MOORE
KRWC CORP. - KOHALA RANCH WATER
COMPANY
billmoore@hawaii.rr.com

LANCE K. PAGADOR
LAIE WATER COMPANY, INC.
pagadorl@hawaiireserves.com

GARRET TOKUDA
SENIOR VP, FINANCE
LANAI WATER CO., INC.
gtokuda@pulamalanai.com

GLENN TREMBLE
MANAGER
LAUNIUPOKO IRRIGATION COMPANY,
INC.
glenn@westmauiand.com

GLENN TREMBEL
VP OPERATIONS
LAUNIUPOKO WATER COMPANY, INC.
glenn@westmauiand.com

LISA M. MARSH
CONTROLLER
MOLOKAI PUBLIC UTILITIES, INC.
tsvetin@molokairanch.com

TAYLOR MOWER
NORTH SHORE WATER COMPANY, LLC
tmower@kennedywilson.com

GLENN TREMBLE
VP OPERATIONS MANAGER
OLOWALU WATER COMPANY, INC.
glenn@westmauiand.com

Certificate of Service
Page 15

ROBERT STOUT
ACCOUNTING MANAGER
WAIKOLOA WATER COMPANY, INC.
dba WEST HAWAII WATER COMPANY
Rstout@hawaiiwaterservice.com

LISA M. MARSH
WAI'OLA O MOLOKAI, INC.
tsvetin@molokairanch.com

ROBERT E. STRAND, ESQ.
CARLSMITH BALL LLP
rstrand@carlsmith.com

PETER Y. KIKUTA
THOMAS W. WILLIAMS
GOODSILL ANDERSON QUINN & STIFEL
LLP
pkikuta@goodsill.com
twilliams@goodsill.com

BRUCE NAKAMURA
JOSEPH A. STEWART
KOBAYASHI SUGITA & GODA
ban@ksglaw.com
jas@ksglaw.com

KRIS N. NAKAGAWA
LIANNA FIGUEROA
MORIHARA LAU & FONG
KNakagawa@moriharagroup.com
lfigueroa@moriharagroup.com

SANDRA-ANN Y.H. WONG
ATTORNEY AT LAW, A LAW
CORPORATION
sawonglaw@hawaii.rr.com

DOUGLAS CODIGA
SCHLACK ITO, LLC
dcodiga@schlackito.com

PAMELA J. LARSON
DAVID Y. NAKASHIMA
JEFFREY T. ONO
WATANABE ING LLP
PLarson@wik.com
DNakashima@wik.com
JOno@wik.com

DEAN T. YAMAMOTO
WIL T. YAMAMOTO
CARLITO CALIBOSO
YAMAMOTO CALIBOSO, LLLC
DYamamoto@ychawaii.com
WYamamoto@ychawaii.com
CCaliboso@ychawaii.com

FILED

2020 May 15 PM 15:18

PUBLIC UTILITIES
COMMISSION

The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Document Management System (DMS).

FILED

2020 Dec 09 PM 13:51

PUBLIC UTILITIES
COMMISSION

The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Document Management System (DMS).