

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 26, 2008

VIA ELECTRONIC FILING

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex parte* communication from the California Public Utilities Commission, *In the Matter of Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements*, WC Docket No. 07-139; *In the Matter of Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160*, WC Docket No. 07-204; *In the Matter of Petition of Frontier and Citizens ILECs for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements*, WC Docket No. 07-204; *In the Matter of Petition of Verizon for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of the Commission's Recordkeeping and Reporting Requirements*; WC Docket No. 07-273.

Dear Ms. Dortch:

On August 21, 2008, Charles Christiansen, Lee-Whei Tan and Roxanne L. Scott of the staff of the California Public Utilities Commission (CPUC) conducted a meeting via telephone conference call with Scott M. Deutchman, Legal Advisor for Commissioner Michael J. Copps to respond to Mr. Deutchman's questions regarding the comments the CPUC filed in the above-referenced proceedings, and regarding the CPUC's use of FCC ARMIS reports. The positions the CPUC staff put forth during this meeting were consistent with the CPUC's publicly-filed comments in opposition to the forbearance petitions in these proceedings. The only additional information discussed during the meeting, and subsequently sent to Mr. Deutchman, was:

1. The "*Proposed Decision of Commissioner Chong in Order Instituting Rulemaking on the Commission's Own Motion to Assess and Revise the Regulation of Telecommunications Utilities*, Rulemaking 05-04-005, (Filed April 7, 2005) currently pending before the CPUC; and

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2. The May 31, 2005 comments of Verizon California Inc., the May 31, 2005 comments of SureWest Telephone, the May 31, 2005 comments of Citizens Telecommunications Company of California Inc., and the May 31, 2005 comments of Emery G. Borsodi of behalf of SBC California (now AT&T California) filed in the above mentioned CPUC Rulemaking 05-04-005.

The Proposed Decision would have the CPUC rely on ARMIS filings instead of requiring any new state reporting from the four largest local exchange telephone corporations operating in California. It also proposed that the CPUC reexamine this position should the Federal Communications Commission grant these companies forbearance from filing ARMIS reports. As of this writing, the CPUC has not adopted the Proposed Decision, which remains subject to change.

The comments of the four carriers filed in the CPUC Rulemaking were discussed and sent to Mr. Deutchman highlighting the following statements in the comments:

- Verizon (at pp.5-6), SureWest (at p.19), and Citizens of California (at pp.4-5) urged the CPUC to largely replace certain existing state monitoring reports with FCC ARMIS reports; or forebear from separate intrastate reporting requirements and conform reporting requirements to ARMIS
- AT&T asked the CPUC to eliminate CA-specific accounting and affiliate transaction rules and defer to FCC rules (at pp.37 & 43)

I am attaching to this Notice of Ex Parte Communication the CPUC's proposed decision and the comments of the four carriers discussed above.

Sincerely,

/s/ HELEN M. MICKIEWICZ

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