Consumer Protection and Enforcement Division

MONTHLY ACTIVITY REPORT

JUNE 2022



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TRANSPORTATION LICENSING AND ANALYSIS BRANCH (TLAB)

TLAB's Licensing Section analyzes applications from carriers, issues permits and certificates to carriers that meet state requirements, writes proposed decisions to approve or deny carriers' CPCN applications, manages changes to carrier operations, communicates with carriers, and tracks carrier compliance with permit requirements. **TLAB's Analysis Section** functions as the Commission's subject matter expert on policy matters, providing technical and advisory support to commissioners, administrative law judges, and all levels of agency management on transportation matters.

Processing Carrier Applications

TLAB's Licensing Section is processing and managing applications for over 5,500 carriers throughout California. Items processed in June 2022 include applications, vehicle and driver updates, vehicle safety inspection results, and other requests. This work is accomplished through the Transportation Carrier Portal (TCPortal), an online system that allows carriers to submit applications and other requests electronically and make payments online. The TCPortal tracks certain licensing activities as shown in the following tables and figures.

Figure 1. Total Permits & Certificates

Total Permits and Certificates. Figure 1 shows the total number of operating authorities (active and suspended) by month.

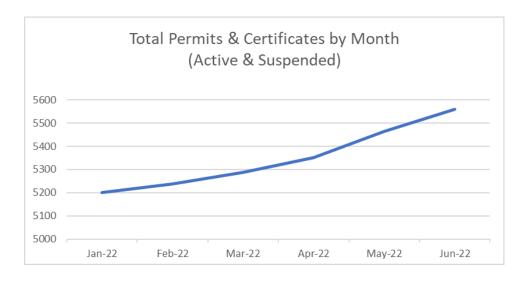


Table 1. Permits and Certificates by Category

Permits and Certificates by Category. The Commission grants permits and certificates for five categories of transportation carriers. Table 1 shows total numbers for those categories in the current month.

Carrier Type	Current Total
Transportation Charter Party	5400
Passenger Stage Corporation	120
Vessel Common Carrier	18
Transportation Network Company	16
Autonomous Vehicle	7

Figure 2. Monthly Completions of Permit Categories

Monthly Completions of Permit Categories. In addition to new applications for operating authorities, TLAB processes refile applications, transfer applications, and renewal applications. Figure 2 shows the numbers of each category completed by month.

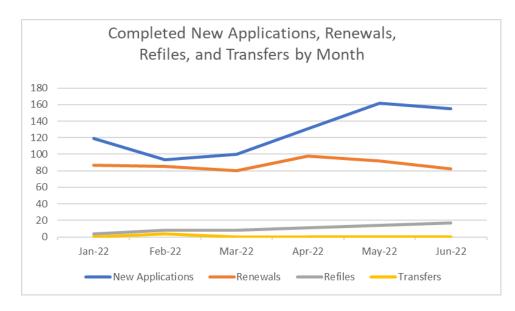


Figure 3. Suspensions and Revocations by Month

Suspensions and Revocations. Carriers can be suspended or revoked for various reasons such as failing to maintain active insurance. Carriers may also voluntarily suspend operations. Figure 3 shows both types of suspensions/revocations by month.

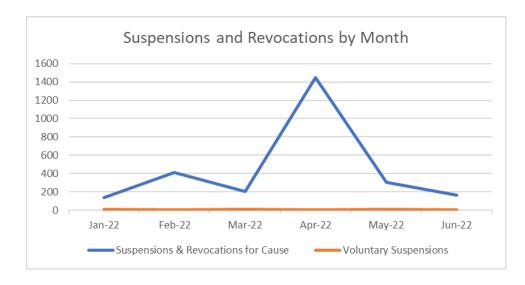


Figure 4. Average Processing Times

Average Processing Times. The total time to process an application, from initial receipt to issuance or denial of a permit or certificate, depends on internal processing time and on the time for external entities to provide necessary information. Upon receipt of applications application, CPUC staff review them for completeness and issue deficiency notices to carriers for any outstanding items.

Examples of these items include evidence of insurance coverage filed by the carrier's insurance agent; evidence of compliance with drug and alcohol testing requirements; and inspection by the California Highway Patrol for vehicles with a seating capacity of 11 or more. Figure 4 shows the average total processing time for the major categories of permits and certificates processed by TLAB.

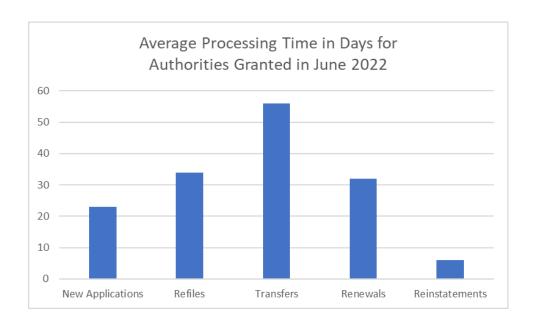
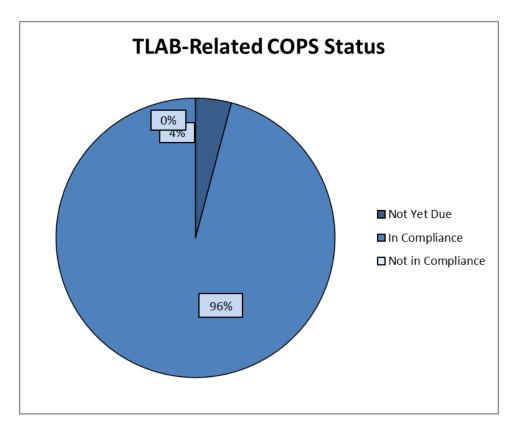


Figure 5. Compliance with Ordering Paragraphs

The Transportation Program is currently responsible for **664** 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. Figure 5 shows compliance with the Ordering Paragraphs.



Docket Activity

Current Policy Proceedings. The Transportation Analysis Section supports three current proceedings. **R.12-12-011** develops regulations relating to transportation network companies and autonomous vehicles. **R.19-02-012** implements Senate Bill 1376, incentivizing transportation network companies to provide on-demand service for persons with disabilities, including wheelchair users who need a wheelchair accessible vehicle. **R.21-11-004** implements the California Clean Miles Standard and Incentive Program, enacted through Senate Bill 1014, requiring the California Air Resources Board and the Commission to jointly work to lower greenhouse gas emissions from transportation network companies.

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

- 1. June 2, 2022: Order granting Stay of D.22-05-003, in response to Lyft Motion for Stay
- 2. June 10, 2022: Comments filed by ValorUS and Raliance on Sexual Assault/Harassment Taxonomy Proposed Decision
- 3. June 13, 2022: Comments filed by HopSkipDrive, Lyft, RAINN, and Uber on Sexual Assault/Harassment Taxonomy Proposed Decision
- 4. June 17, 2022: Reply comments filed by Uber on Sexual Assault/Harassment Taxonomy Proposed Decision
- 5. June 21, 2022: Motions for Confidential Treatment of certain information in TNC Annual Reports filed by Lyft, Uber, HopSkipDrive, Nomad
- 6. June 23, 2022: D.22-06-029 Adopting Uniform Taxonomies for Sexual Assault and Harassment and Establishing Training, Investigating, and Reporting Protocols.

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

- 1. June 13, 2022: ALJ Ruling Extending Deadline for Additional Track 5A Proposals on TNCs' performance framework for pre-scheduled WAV rides
- 2. June 17, 2022: Uber, Lyft submit information responsive to ALJ Order regarding trip cancellations data
- 3. June 23, 2022: D.22-06-053 Decision Denying Rehearing of D.21-11-004 (regarding exemption standard)
- 4. June 24, 2022: Lyft amends its required data submission under Track 5A Ruling
- 5. June 30, 2022: Additional Track 5A Proposals by Uber, SF, Lyft, and CPED

R.21-11-004 / Clean Miles Standard / Wang / Shiroma.

 June 13, 2022: Reply comments on ALJ Workshop Ruling filed by Cal Advocates and SFTWA

Carrier Application Proceedings. The Transportation Licensing Section assists the Commission in the regulation of Passenger Stage Corporations and Vessel Common Carriers. **Passenger Stage Corporations (PSCs)** are carriers that transport passengers between points on an individual fare basis. Examples are fixed-route bus services and "share-the-ride" airport shuttle services. **Vessel**

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Common Carriers (VCCs) are carriers that transport persons or property between points within the state. Examples are commute ferry services in the San Francisco Bay and services between California mainland points and Catalina. PSCs and VCCs are common carriers and must file with the Commission through a formal process. Both carrier types require a "certificate of public convenience and necessity" (CPCN) from the Commission for the authority to operate in California.

- A.21-06-006 / Application of Ventura Transit System, Inc. (PSC23334) to expand its passenger stage authority under to establish a scheduled route to serve three hotels in the immediate vicinity of the present service, under the existing Zone-of-Rate-Freedom (ZORF) granted in decision D.12- 01-023 / 06/13/2022 Initial briefs filed by parties.
- A.22-01-009 / Application of MAWS Transportation, LLC (PSC28383) to Amend its Certificate of Public Convenience and Necessity to Increase its Zone-of Rate Freedom (ZORF) fares and to expand Its Service Area to Include the Eastern Sierra Regional Airport / 06/22/2022 MAWS submitted additional records for their application.
- A.22-05-019 / Neptune Holding Inc.'s Application for Authority to Control Greyhound Lines, Inc.
 Pursuant to Section 854 of the California Public Utilities Code / 06/23/2022 Motion submitted
 by Neptune Holding to Filed Confidential Information Under Seal
- A.22-01-014 / Application of Avalon Freight Services LLC (VCC91) For Authorization to Modify
 Rates for Its Scheduled Vessel Common Carrier Freight Service Between the Port of Los Angeles,
 California on the one hand, and Avalon on Santa Catalina Island on the other hand /
 06/07/2022 Scoping Ruling issued. 06/27/2022 Ruling issued requesting additional
 information from Avalon Freight Services
- A.22-06-015 / Application of Mamo G. Tegegne doing business as DREAM HIGH
 TRANSPORTATION for Authority to Operate as a Passenger Stage Corporation Between points
 in the Counties of San Francisco, Alameda, Contra Costa, Santa Clara, Solano, Marin and San
 Mateo, and the San Francisco, Oakland and San Jose International Airports; and to Establish a
 Zone of Rate Freedom / 06/29/2022 Formal application to reinstate authority filed.
- A.22-06-014 / In the matter of the Application of THE LYNX LLC, a California limited liability company, dba LINQ, for a Certificate of Public Convenience and Necessity to provide an on call, door-to-door, passenger stage service, between the cities of San Diego (Old Town Transit Center), Oceanside and Palm Springs, on the one hand, and the Los Angeles International Airport (LAX), on the other hand; and, to establish a Zone of Rate Freedom / 05/19/2022 Formal application filed.

Joint Agency Collaboration/Outreach/Training

Joint Agency Collaboration. Information sharing and collaboration with other transportation agencies is a critical part of TLAB's work.

- o June 2, 2022: Bi-monthly meeting with CARB on Clean Miles Standard implementation
- June 8, 2022: Bi-monthly meeting with DMV on AV Programs
- June 8, 2022: TLAB meeting with California Commission on Disability regarding TNC Access for All Program
- June 9, 2022: TLAB monthly meeting with Local Access Fund Administrators in TNC Access for All Program
- June 10, 2022: TLAB meeting with Caltrans' Cal-ITP team
- June 14, 2022: TLAB meeting with DMV on AV Programs
- o June 27, 2022: TLAB meeting w/ DOJ TrustLine Registry representatives
- June 29, 2022: Bi-monthly meeting with DMV on AV Programs

Outreach and Education. TLAB provides outreach and education to potential and current carriers through presentations on application fundamentals at venues such as SFO and LAX, and attendance at functions sponsored by transportation-related organizations such as the Greater California Livery Association and the California Bus Association.

Training. TLAB managers and staff regularly attend all trainings required by the Commission, as well as trainings for developing work skills and industry-specific trainings.

- Hot Weather Heat training
- New Employee Training
- Covid-19 Prevention Program Training
- TCT Phase 1-training
- Ethics Training
- Word Essential Training

TRANSPORTATION ENFORCEMENT BRANCH

The Transportation Enforcement Branch (TEB) regulates Charter-Party Carrier of Passengers (TCP) (e.g., limousines, airport shuttles, chartered and scheduled bus operators, Transportation Network Companies (TNC)) and vessels in California to safeguard the public by ensuring compliance with Commission General Orders (GO), Public Utilities (PU) Codes, and other applicable laws and regulations. TEB ensures compliance through investigations, enforcement, proactive compliance inspections, and field surveillance and inspections. TEB also supports a consumer complaint 800 phone line (Transportation Complaint (ca.gov)), and conducts outreach and training activities for passenger carriers, law enforcement, and prosecutors, on regulations that affect passenger carriers.

Consistent with the Commission's Strategic Directives¹ and Enforcement Policy², TEB developed the TEB Safety Management System that is implemented through the following concepts Transportation Safety Assurance, Transportation Risk Management, and Transportation Safety Promotion.

Transportation Safety Management System

TEB reports the following progress for June 2022, for the following program elements.

1. Transportation Safety Assurance – Assuring that the entities the Commission regulates comply with the law and have sufficient training and resources to ensure the safety of the public, their workers, and the environment. For TEB, this includes Investigations, Carrier Inspections, Field Operations, and related Enforcement Activities.

Formal Enforcement Proceedings

 I.21-12-001/Uber Technologies, Inc., and Uber Black Sub-carriers/ALJ **Stevens/Commissioner Shiroma.** On December 2, 2021, the Commission opened an Order Instituting Investigation (OII) to determine whether passenger carriers violated any provisions of the Public Utilities Code or other applicable rules and regulations. On March 23, 2022, Assigned Commissioner, Genevieve Shiroma, issued a scoping memo and ruling that sets forth the issues, need for hearing, schedule, category, and other matters necessary to scope this proceeding pursuant to Public Utilities Code Section 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure. No update for June 2022.

¹ CPUCs Strategic Directives (ca.gov)

² CPUC Adopts Enforcement Policy to Promote Maximum Compliance, Transparency, and Public Safety

- 2. **Transportation Risk Management** Continually identifying, assessing, and reducing operational risks through mitigation measures faced or posed by the entities the CPUC regulates.
 - Review of individual reports based on evaluation of quantitative data compared to qualitative information collected in 2021.
- 3. **Transportation Safety Promotion** Supporting efforts to assure that the public and regulated transportation entities can make informed choices and know how to respond to unsafe situations. For TEB, this includes Training and Education, Outreach Efforts with Industry and Law Enforcement, and Commission Engagement.
 - None for June 2022

Table 2. TEB Enforcement Activities

12 Month Enforcement Activity	July 2021	Aug 2021	Sept 2021	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022	Mar 2022	Apr 2022	May 2022	Jun 2022	Total
Open Investigations	67	71	64	74	62	60	46	42	48	66	82	98	N/A
New Investigations	8	5	15	26	18	6	22	21	33	8	7	24	193
Investigations Completed	4	12	5	38	20	20	26	15	15	14	3	7	179
Investigations Open Longer than 6 Months	3	5	7	6	4	9	19	19	23	25	24	27	N/A
% of investigations Open Longer than 6 Months	4%	7%	11%	8%	6%	15%	41%	45%	48%	38%	29%	28%	N/A
Cease and Desist Notices	9	2	8	10	14	4	12	9	16	14	10	17	125
Warning Letters	0	1	6	3	7	4	2	2	5	6	2	3	41
Telephone Disconnects	0	1	0	0	1	0	0	0	0	0	0	0	2
Citations	2	4	6	3	4	3	8	3	1	4	1	4	44
Civil Compromise Actions	2	0	2	2	0	0	2	9	5	7	3	5	37
Vehicle Impounds	2	0	4	0	0	1	6	3	11	6	9	7	49

Figure 6. TEB Fines Assessed and Amounts Collected from Investigations

July 2021 – June 2022

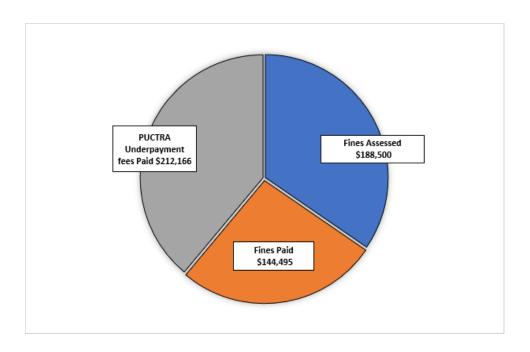


Table 3. Consumer Intake Unit (CIU) Statistics

CIU Statistics	
Open complaints as of June 1, 2022	0
New complaints received during month	10
Subtotal	10
Less: Complaints closed by CIU directly	1
Complaints Referred to Enforcement during month	7
Open CIU complaints as of June 30, 2022	2

Table 4. Citation Appeal Proceedings

Docket No.	Entity	Status
K.19-09-015	Jordan & Associates Investments, dba Sun Buggie Fun Rentals (TCP 38563-Z)	On June 1, 2022, ALJ Draft Resolution was issued. The citation appeal should be granted and the citation is dismissed.
K.20-06-003	David Gorgoyan dba Celebrity Rides (TCP 35518)	Hearing held on 7/29/21. Briefs submitted 9/28/21. No update for June 2022.
K.21-01-019	About Time Limousines LLC (TCP 21892)	ALJ division reports a resolution will be issued shortly.
K.21-02-001	Bogale Getu Abebe., Hayward (TCP 32714)	Hearing held on May 23, 2022. Waiting for ALJ decision.
K.22-01-004	Taco Tour LLC, San Diego, (TCP 38185)	Carrier has agreed to make 12 monthly payments. No update for June 2022.
K.22-01-005	Pro Limo Service, Tarzana, (TCP 35882)	Settlement reached on Mar 24, 2022. Case dismissed without prejudice 5/10/2022.
K.22-02-004	Earl McLeod, Hayward, unlicensed	Hearing held on May 2, 2022. Waiting ALJ decision. No update for June 2022.
K.21-10-007	PLS Transportation Group	Hearing held on May 5, 2022. On June 7, 2022, CPED filed the Joint Motion for Adoption of Settlement Agreement.
K.22-06-007	Amore' Limousine Service, Inc (TCP 25876	Need to file compliance filing by July 11, 2022.

Table 5. TEB Field Operations – Probable Violations and Observation Summary

		n Charter-Party CP)	Transportati Comp (TN	anies		ge Corporations PSC)
Month	Observed	Probable Violations	Observed	Probable Violations	Observed	Probable Violations
June 2022	160	15	500	45	2	0
May 2022	143	7	356	71	2	0
Apr 2022	129	1	510	49	0	0
Mar 2022	155	7	465	74	0	0
Feb 2022	96	0	558	131	0	0
Jan 2022	49	0	228	35	0	0
Dec 2021	148	4	487	40	0	0
Nov 2021	42	0	253	21	0	0
Oct 2021	192	10	862	107	0	0
Sept 2021	136	4	693	114	0	0
Aug 2021	254	4	930	102	2	0
July 2021	213	2	781	85	1	0

Table 6. Joint Operations with Law Enforcement Agencies

Agency	Operation
Los Angelese International Airport (LAX)	TNC/TCP Passenger carrier operation at LAX
California Highway Patrol (CHP)	TCP Passenger carrier inspection at Cache Creek Casino
Napa County District Attorney's Office and St. Helena Police Department	TCP Passenger carrier inspection in Napa County
California Highway Patrol (CHP) and National	TCP Passenger carrier inspection at Yosemite
Park Services	National Park

UTILITIES ENFORCEMENT BRANCH (UEB)

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.

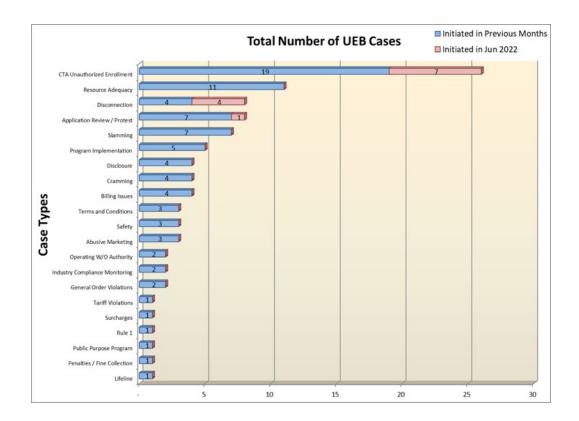
Monthly Highlights

- MetroPCS OII (I.22-04-005): On June 1, 2022, CPED filed its response to MetroPCS' May 17, 2022 Motion to Dismiss, contending that MetroPCS failed to demonstrate good cause to dismiss the OII without prejudice. On June 2, 2022, CPED filed reply comments to MetroPCS' May 23, 2022 response to the preliminary scoping memo, arguing that all four issues set forth in the preliminary scoping memo should be included in the final scooping memo.
- Orange County Power Authority (OCPA) RA Citation Appeal (K.22-05-017): On June 3, 2022, CPED filed its compliance filing.
- San Diego Community Power (SDCP) RA Citation Appeal (K.21-11-001): On June 20, 2022, CPED and SDCP filed a joint response indicating there is no need for hearings.
- Ambit CTA Citation (Resolution UEB-003-0061 to 0180): On June 24, 2022, CPED issued 120 CTA citations against Ambit California, LLC in the amount of \$120,000. CPED alleges that Ambit failed to comply with Third-Party Verification rules.

Key Activities

UEB is working on a total of 98 cases. Investigations center primarily on CTA Unauthorized Enrollment, Resource Adequacy and Disconnection. UEB's cases come from a variety of sources, with Inter-Division referrals and UEB's own scanning activities playing key roles.

Figure 7. UEB Total Number of Cases by Type as of June 30, 2022



Citations/Fines/Reparation

In June 2022, UEB issued 122 citations totaling \$122,000 under the CTA Citation program. UEB also issued an RA citation in the amount of \$11,000. Cumulative 2022 fines, reparations and penalties imposed are shown below.

Table 7. UEB Fines, Reparations, and Penalties

Date	Citations/Fines/ Reparation
Cumulative 2022	\$8,034,563
May 2022	\$133,000

• **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, Decisions 10-06-038, 11-06-022, 14-06-050, 19-06-026, and 20-06-031. In June, UEB issued one RA citation totaling \$11,000, and received payment for one citation totaling \$2,500. Details for the citation issued are shown below.

Table 8. UEB Resource Adequacy Citations

RESOURCE ADEQUACY CITATIONS MAY 2022						
Energy Citation #	Date Issued	Company	Citation Amount	Date Due	Status	
E-4195-0119	6/3/2022	San Diego Gas & Electric	\$11,000	7/1/2022	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 June, UEB reviewed 26 CTA-related complaints received by the Consumer Affairs Branch (CAB) in May 2022 and identified 10 needing investigation for potential unauthorized enrollment. Staff identified four duplicate cases. On June 9, 2022, staff issued seven data requests for proof of enrollment authorization for nine customers. One case already had TPV and information available on CIMS for staff's review. UEB received TPV recordings for three customers; a TPV recording and signed contract for one customer; a TPV recording and welcome package for one customer; signed contracts and electronic TPVs for three customers; a TPV recording and welcome package from one customer; and one customer did not have a service account with the subject CTA. The May CTA investigation is closed.

On June 15, 2022, UEB received payment from Greenwave Energy, LLC for a citation issued on April 28, 2022 (Citation No. UEB-003-0058). On June 2, 2022, UEB issued Bolt Energy Services, LLC Citations No. UEB-003-0059 to 0060. UEB received payment for the citation on June 10, 2022. On June 24, 2022, UEB issued Ambit California, LLC (Ambit) Citations No. UEB-0061 to 0180. Ambit's response is due by July 25, 2022. Details of these citations can be found in the table below.

Table 9. UEB CTA-Related Complaints

	CTA-Related	l Complaints				Cease	
Month Received	Total Reviewed	Unauthorized Enrollment	Data Requests Issued	Proof of Authorization Obtained	Citations Issued	and Desist Letters Issued	
June	26	10	7	8	0	0	

Table 10. UEB CTA Citations

	CTA CITATIONS							
Citation #	Date Issued	Company	Citation Amount	Date Due	Status			
UEB-003-0059 to 0060	6/2/2022	Bolt Energy Services, LLC	\$2,000.00	7/5/2022	Payment received 6/10/2022			
UEB-003-0061 to 0180	6/24/2022	Ambit California, LLC	\$120,000.00	7/25/2022	Pending			
		TOTAL	\$122,000.00					

Compliance with Ordering Paragraphs

There were no new Ordering Paragraphs added to UEB's COPS tracker for the month of June. UEB was responsible for 41 separate Ordering Paragraphs. As of June 2022, 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.

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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.

UEB-Related Proceedings

Table 11. 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	Houck
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
K.21-11-018	Appeal of Shell Energy North America to citation E-4195-113 issued on October 21, 2021 by Consumer Protection & Enforcement Division.	Wercinski	
K.22-05-017	Appeal of Orange County Power Authority to citation E-4195-116 issued on April 20, 2022 by Consumer Protection & Enforcement Division.		
1.22-04-005	Order Instituting Investigation on the Commission's Own Motion into MetroPCS California LLC Failure to Remit Prepaid Mobile Telephony Service Surcharges and User Fees	Mason	Houck

Outreach/Training/Other Activities

State National Action Plan (SNAP): On June 16, 2022, the FCC discussed the Alternative Connect America Cost Model (A-CAM) which will establish an Enhanced A-CAM program to provide additional universal service support to certain rural carriers in exchange for increasing deployment to more locations at higher speeds. In particular, the proposal would achieve widespread deployment of faster 100/20 Mbps broadband service throughout the rural areas served by carriers currently receiving A-CAM support.