

7 | AT&T CORPORATE AND CALIFORNIA FINANCIALS AND ILEC INVESTMENT POLICIES: PHASE 2 UPDATE

Principal observations and takeaways

- AT&T senior management's interest in and attention to its legacy wireline ILEC operations continues to be subordinated to its wireless operations and the more recent satellite TV and video content acquisitions.
- Despite experiencing a 76.4% drop in legacy switched access lines from 2010 through 2019, AT&T California's gross revenues decreased by only 31.64% over the same period.
- Even when confined to only those revenue sources directly attributable to legacy switched access line services, AT&T California legacy access line-related revenues decreased by only about 53.4%, significantly below the 76.4% drop in switched access line demand, because AT&T California has raised its rates for legacy flat-rate residential service by 152.6% since the service was de-tariffed by the CPUC in 2009..
- This succession of rate increases is consistent with and in support of a "harvesting" strategy aimed at maximizing revenues from existing customers until they ultimately discontinue their service, thus allowing A&T to maintain revenues despite a massive drop-off in demand.
- AT&T California's response to the erosion of the market for legacy POTS services has been to raise prices, cut back on investment and maintenance, and instead "harvest" those customers that remain on its network for as long as they continue to take their service.

- The fact that AT&T has been able to profitably implement a succession of large annual legacy services rate increases for more than a decade since the implementation of URF raises serious questions as to the Commission's conclusion in URF that competition had developed to a point where continued regulatory protection of basic residential telephone service prices is no longer required or appropriate.
- Over the past two years (2018-19), AT&T California continued to disinvest from its network. The Company had total net after-tax income of \$3.21-billion, but paid out \$3.42-billion in dividends to its parent company, AT&T Inc -- i.e. it paid AT&T dividends that were some \$219.5-million more than the California company had earned from its ongoing operations.
- Between 2010 and 2019, AT&T California paid dividends to AT&T Inc. that exceeded its total net income over the period by roughly \$4.43-billion.
- A change in the accounting procedures that AT&T California has utilized for its ARMIS-type reports after 2017 has resulted in a roughly \$5-billion overstatement of its net Telecommunications Plant in Service for 2018 and 2019.
- Those capital investments that AT&T has been making in its California ILEC have, for the most part, not been directed at legacy basic voice services.
- AT&T's "harvesting" philosophy explains why AT&T has failed to improve service quality for its POTS services at least to the point where the GO 133-C/D standards can be achieved, because the gains it can realize by raising prices and curtailing investment and maintenance far exceed any financial penalties it might suffer from persistently poor service quality.

AT&T CORPORATE AND CALIFORNIA
ILEC INVESTMENT POLICES
PHASE 2 UPDATE

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Introduction

This chapter provides updated financial data both for Pacific Bell d/b/a AT&T California and for its corporate parent, AT&T Inc. In Chapter 7 of our Phase 1 Report, we offered the following assessment of AT&T California's financial condition and its investment policies:

- AT&T California's potential revenue from raising prices and curtailing investments in its legacy POTS services far exceed any financial penalties imposed for its failure to meet the GO 133-C/D service quality standards.
- To support its "harvesting" strategy and maintain revenues despite a massive drop-off in demand, AT&T California has raised its rates for legacy flat-rate residential service by 152.6% since the service was de-tariffed by the CPUC in 2009.
- AT&T Inc. senior management's interest in and attention to its legacy wireline ILEC operations has been largely supplanted by its wireless operations and the recent satellite TV and video content acquisitions.
- AT&T California financial statements show an incomplete assessment of the ILEC's financial condition due to the large volume of inter-affiliate transactions made at transfer prices that are not set on the basis of arm's length negotiations.
- Cumulatively, over the full 8-year Phase 1 study period, AT&T California had total net after-tax income of \$3.4-billion, but paid out \$7.6-billion to its parent company, AT&T Inc, thereby eroding the California company's capital base by roughly \$4.2-billion and impairing its ability to maintain and upgrade its aging infrastructure.
- AT&T, Inc. has also been eroding its California ILEC's capital base by investing less in its infrastructure than its annual depreciation accruals and retirements.
- AT&T's "harvesting" philosophy explains why AT&T has failed to improve service quality for its POTS services at least to the point where the GO 133-C/D standards can be achieved, because the gains it can realize by raising prices and curtailing investment and maintenance far exceed any financial penalties it might suffer from persistently poor service quality.

Our examination of the two additional years of financial results indicates that, for the most part, the various conditions and practices that we had previously identified have persisted and, in some respects, have been further escalated.

AT&T California remains the underlying provider of most retail local network services being offered under the AT&T California or other AT&T affiliate brand names

The scope of the direct retail offerings by AT&T California have continued to narrow, confined mainly to legacy circuit-switched local voice telephone access and message services. As AT&T California has expanded its broadband infrastructure, it has steadily migrated its legacy customer base to bundles of Internet access, VoIP telephone service, terrestrial and satellite video services and, since its acquisition of Time Warner in 2018, a variety of video content. Even where customers continue to be served via circuit-switched voice services, AT&T California typically bundles the local voice service with long distance telephone service furnished by AT&T's long distance affiliate. Notably, the retail customer for most of these bundles still receives only one monthly bill, issued by AT&T California on behalf of itself and whichever other AT&T affiliates are jointly furnishing the customer's bundle of services. Mechanically, and with the exception of tariffed switched and special access services, the providing affiliates will "purchase" the underlying network services and functions, including billing and collection services, from AT&T California at mutually-agreed-upon transfer prices.³⁹ Where tariffed services are involved, the affiliate will (presumably) be charged the tariff rates.

From the perspective of most residential consumers, the organizational assignment of responsibility for the individual retail offerings, while nominally disclosed on the customer's monthly bill, is of little interest or consequence: Most direct contacts between retail residential/small business customers and AT&T are accomplished via AT&T California, irrespective of which entity is nominally responsible for the retail provision of a particular service within the customer's service bundle.

Even where AT&T California is not the retail provider of a particular service or service component, its role as the underlying network provider requires that its network be capable of supporting these various affiliate-offered services. For example, AT&T California has been upgrading its network to support several types of broadband services – *U-verse* brand IPTV, *U-verse* brand Internet, and *U-verse* brand VoIP-based phone service – by extending fiber into individual neighborhoods in relatively close proximity to its end-user customers under a Fiber-to-the-Node ("FTTN") architecture.⁴⁰ As of the end of 2017, some 557 out of the total of 615 AT&T California wire centers had been upgraded to support at least one if not all three of these broadband services.⁴¹ AT&T California has confirmed that "no AT&T-CA wire centers that were not Broadband enabled as of May 11, 2018 have since been upgraded to become Broadband

39. This is undoubtedly an overly simplified description. AT&T Inc., the parent company, is the ultimate owner of several hundred domestic and foreign affiliates. Most inter-affiliate financial transactions and relationships are opaque, both as to their precise nature and their magnitude.

40. AT&T has recently dropped its use of the *U-verse* brand, and now refers to its Internet and video services as "AT&T Internet" and "AT&T TV."

41. AT&T California Response to CD Data Request 01A.

enabled.”⁴² According to its [REDACTED]

As discussed in Chapter 4, although the *motivation* behind the deployment of FTTN, FTTP and other network upgrades is the capability to offer broadband services to compete with cable MSO offerings, once installed these same facilities can and will be used to provide legacy POTS and other circuit-switched services.

The AT&T California component of parent AT&T Inc. revenues have been steadily diminishing, as has the share of the overall AT&T capital budget that is being allocated to the California ILEC.

Over the 2010-2017 period, AT&T California’s parent AT&T Inc. had experienced significant growth in its overall gross revenues, rising 29.2% from \$124.3-billion in 2010 to \$160.5-billion in 2017. By 2019, AT&T gross revenues had reached \$181.2-billion. AT&T’s market capitalization as of December 31, 2019 was approximately \$283.5-billion, although as of December 15, 2020, it had declined to about \$217.5-billion as a result of the broader COVID-19 economic impacts. The primary sources of AT&T’s revenue growth have come from wireless services, where the number of AT&T Mobility connections nationwide grew by 73.9%, from 95.4-million in 2010 to 165.9-million in 2019,⁴³ and from several key acquisitions, including DirecTV and Time Warner.



AT&T senior management’s interest in and attention to its legacy wireline ILEC operations continues to be subordinated to its wireless operations and the more recent satellite TV and video content acquisitions.

AT&T California revenues, on the other hand, have been moving in the opposite direction. As shown on Table 7.1 below, in 2010, AT&T California gross revenues were \$9.70-billion, dropping to \$8.63-billion in 2017. Between 2017 and 2019, AT&T California revenues decreased by another 23.15%, to \$6.63-billion. AT&T California’s share of total AT&T Inc. revenues has fallen by an even greater amount, from 7.80% in 2010 to 3.66% in 2019.

42. AT&T California Response to CD Data Request 12-A-10.

43. AT&T Inc. Annual Reports, 2010, 2019 .

Table 7.1										
AT&T CALIFORNIA AND AT&T INC.										
TOTAL OPERATING REVENUES 2010-2019										
(\$000,000)										
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
AT&T Inc.	124,280	126,723	127,434	128,752	132,447	146,801	163,786	160,546	170,756	181,193
AT&T CA	9,697	9,754	9,374	9,580	9,641	10,008	9,441	8,626	5,799	6,629
AT&T CA %	7.80%	7.70%	7.36%	7.44%	7.28%	6.82%	5.76%	5.37%	3.40%	3.66%

Source: AT&T Inc. Annual Reports 2010-2019; AT&T CA ARMIS 2010=2019 Forms 43-01 as filed with CPUC.

As discussed in Chapter 4A, AT&T California had experienced a precipitous drop in total legacy circuit-switched access lines over the 2010-2017 period, and that downward trend has persisted into 2018 and 2019. Nationally, AT&T Inc. had actually sustained a slightly greater access line loss than its California subsidiary, as shown in Table 7.2 below.

Table 7.2										
AT&T CALIFORNIA AND AT&T INC.										
LEGACY SWITCHED ACCESS LINES IN SERVICE 2010-2019										
(000)										
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
AT&T Inc.	41,883	36,734	31,887	24,639	19,896	16,670	13,986	11,753	10,002	8,487
AT&T CA	7,602	6,681	5,837	4,996	4,149	3,415	2,872	2,417	2,072	1,793
AT&T CA %	18.15%	18.19%	18.31%	20.28%	20.85%	20.49%	20.54%	20.56%	20.72%	21.12%

Source: AT&T Inc. Annual Reports 2010-2019 "Selected Subscribers and Connections"

Thus, where AT&T nationally had experienced a net legacy switched access line decrease of 71.9% over the 2010-2017 period, for California, AT&T's switched access lines had decreased by slightly less, about 68.2%. Between 2017 and 2019, however, AT&T nationally lost another 27.8%, or 3.27-million of its legacy switched access lines; AT&T California's access line losses were at a slightly lower rate, 25.8%, or 624,000. Notably, however, despite experiencing a cumulative loss of 76.4% in legacy switched access lines between 2010 and 2019, AT&T California gross revenues decreased by only 31.6% over the same period, as summarized on Table 7.3 below:

Table 7.3

**AT&T CALIFORNIA OPERATING REVENUES
DECREASED, BUT BY FAR LESS THAN THE DECREASE
IN LEGACY SWITCHED ACCESS LINES 2010-2019
(\$000,000 and 000)**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Revenues	\$ 9,697	\$ 9,754	\$ 9,374	\$ 9,580	\$ 9,641	\$10,008	\$ 9,441	\$ 8,626	\$5,799	\$6,629
% of 2010		100.59%	96.67%	98.79%	99.42%	103.21%	97.36%	88.96%	59.80%	68.36%
Switched access lines	7,602	6,681	5,837	4,996	4,149	3,415	2,872	2,417	2,072	1,793
% of 2010		87.88%	76.78%	65.72%	54.58%	44.92%	37.78%	31.79%	27.25%	23.58%

Source: AT&T CA ARMIS Form 43-01 as filed with CPUC; POTS lines in service derived from GO 133-C § 3.3 and 3.4 Trouble Reports per 100 Lines (TRPH) quarterly filings, 2010-2019. Switched access lines are average over each year.

Clearly, a significant portion of AT&T California operating revenues come from the ongoing succession of POTS rate increases and from services other than legacy POTS lines. It is thus instructive to compare the decrease in switched access lines more directly with the principal revenue sources associated with these services. Fortunately, more detailed revenue data is provided in the annual financial reports, ARMIS Forms 43-01, 43-02 and 43-03, filed by AT&T California with the CPUC:



Despite experiencing a 76.4% drop in legacy switched access lines from 2010 through 2019, AT&T California's gross revenues decreased by only 31.64% over the same period.

As shown in Table 7.4 below, when confined to only those revenue sources directly attributable to legacy switched access line services – specifically, USOA Account 5001 (Basic Area Revenue),⁴⁴ USOA Account 5081 (End User Common Line revenue),⁴⁵ and USOA

44. 47 CFR §32.5001 defines “Basic Area Revenues” to “include revenue derived from the provision of the following: (1) Basic area message services such as flat rate services and measured services. Included is revenue derived from non-optional extended area services. Also included is revenue derived from the billed or guaranteed portion of semi-public services. (2) Optional extended area service. (3) Cellular mobile telecommunications systems connected to the public switched network placed between mobile units and other stations within the mobile service area. (4) General radio telecommunications systems connected to the public switched network placed between mobile units and other stations within the mobile service area, as well as revenue from mobile radio paging, mobile dispatching, and signaling services. (b) Revenue derived from charges for nonpublished number or additional and boldfaced listings in the alphabetical section of the company’s telephone directories shall be included in account 5230, Directory revenue. (c) Revenue from private mobile telephone services which do not have access to the public switched network shall be included in Account 5200, Miscellaneous revenue.

45. 47 CFR § 32.5081 End user revenue: (a) This account shall contain federally and state tariffed monthly flat rate charge assessed upon end users. (b) Subsidiary record categories shall be maintained in order that the company may separately report amounts related to federal and state tariffed charges.

Account 5082 (Switched Access revenue),⁴⁶ AT&T California legacy access line-related revenues decreased by only about 53.4%, significantly below the 76.4% drop in switched access line demand. Significantly, Account 5082 Switched Access Revenues – revenues from charges that AT&T California collects when its legacy access line customers originate or receive calls to or from a long distance carrier (including AT&T’s long distance affiliate) – decreased by almost as much as the number of legacy switched access lines –70.5% vs. 76.4%. Switched access rates, which remain subject to tariff at both the state and federal levels, had remained unchanged over the 2010-2017 period.

Table 7.4										
AT&T CALIFORNIA LEGACY SWITCHED ACCESS LINE REVENUES HAVE DECREASED BY A GREATER PERCENTAGE THAN FOR TOTAL OPERATING REVENUES GENERALLY, BUT STILL BY FAR LESS THAN THE DECREASE IN LEGACY SWITCHED ACCESS LINES 2010-2019 (\$000 and 000)										
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
USOA Acct 5001 Basic Area Rev	\$2,118,017	\$ 2,121,000	\$ 1,966,000	\$ 1,882,000	\$ 1,729,553	\$ 1,579,000	\$ 1,448,000	\$ 1,258,000	\$1,120,148	\$1,059,109
USOA Acct 5081 EUCL Revenue	\$ 627,273	\$ 538,000	\$ 492,000	\$ 452,000	\$ 404,625	\$ 363,000	\$ 333,000	\$ 300,000	\$224,585	\$223,304
USOA Acct 5082 Switched Access	\$ 320,356	\$ 278,617	\$ 282,585	\$ 262,064	\$ 260,174	\$ 220,886	\$ 180,913	\$ 113,694	\$82,314	\$94,500
Total switched access line rev	\$3,065,646	\$2,937,617	\$2,740,585	\$2,596,064	\$2,394,352	\$2,162,886	\$1,961,913	\$1,671,694	\$1,427,047	\$1,376,913
Percent of 2010 Switched Access Revenues		95.82%	89.40%	84.68%	78.10%	70.55%	64.00%	54.53%	46.55%	46.55%
Switched access lines (000)	7,602	6,681	5,837	4,996	4,149	3,415	2,872	2,417	2,072	1,793
Percent of 2010 Switched Access Lines		87.88%	76.78%	65.72%	54.57%	44.92%	37.78%	31.79%	27.25%	23.58%
\$ per Switched access line	\$403.27	\$439.70	\$469.52	\$519.63	\$577.09	\$633.35	\$683.12	\$691.64	\$688.74	\$768.02
Source: AT&T CA ARMIS Form 43-01 as filed with CPUC; POTS lines in service derived from GO 133-C § 3.3 and 3.4 Trouble Reports per 100 Lines (TRPH) quarterly filings, 2010-2019. Switched access lines are average over each year.										

46. 47 CFR § 32.5082 Switched access revenue. (a) This account shall consist of federally and state tariffed charges assessed to interexchange carriers for access to local exchange facilities. (b) Subsidiary record categories shall be maintained in order that the company may separately report the amounts contained herein that relate to limited pay telephone, carrier common line, line termination, local switching, intercept, information, common transport and dedicated transport. The subsidiary records shall also separately show the federal and state tariffed charges. Such subsidiary record categories shall be reported as required by part 43 of this chapter.



Even when confined to only those revenue sources directly attributable to legacy switched access line services, AT&T California legacy access line-related revenues decreased by only about 53.4%, significantly below the 76.4% drop in switched access line demand.

AT&T California’s response to the rapidly eroding demand for legacy POTS services has not been to cut prices to retard such “cord-cutting,” but instead to implement large rate increases so as to “harvest” as much revenue from the remaining POTS customers as long as they continue to retain their service.

The 2006 URF decision allowed California’s large ILECs to *detariff* most of their retail services.⁴⁷ As we discussed in Chapter 4A, as soon as detariffing of residential rates took effect in January 2009, AT&T implemented a 26.3% rate increase for flat-rate residential service and a 27.7% increase for measured residential service. A succession of rate increases has continued ever since, and by the end of 2017 AT&T California’s rates for flat-rate and measured residential POTS access lines had risen to 152.6% and 325.4% of their pre-URF levels, respectively. This succession of rate increases for legacy POTS services is summarized in Chapter 4A, at Table 4A.10.



This succession of rate increases is consistent with and in support of a “harvesting” strategy aimed at maximizing revenues from existing customers until they ultimately discontinue their service, thus allowing A&T to maintain revenues despite a massive drop-off in demand.

These regular and ongoing increases in legacy circuit-switched POTS access line rates are entirely consistent with the type of “harvesting strategy” discussed in Chapter 4. While putatively “subject to competition,” these legacy services have been on the decline over the entire 2010-2017 period as customers replace them with AT&T *U-verse* digital service bundles of voice, Internet access and video, or with competitor-provided wireline services, or with wireless. A “harvesting strategy” can be pursued where it is determined that, while some customers will discontinue their service in response to the steadily increasing prices, there are still a sufficient number of customers who confront few if any actual competitive alternatives and/or who simply retain their AT&T legacy POTS service due to inertia – they simply haven’t gotten around to seeking out any alternatives.

47. PU Code § 871.5(a) caps LifeLine rates at one-half of the 1FR rate for flat-rate basic residential service.



AT&T California's response to the erosion of the market for legacy POTS services has been to raise prices, cut back on investment and maintenance, and instead "harvest" those customers that remain on its network for as long as they continue to take their service.

A company will raise its prices only where such an action will result in an increase in profit overall, where the price elasticity of demand is sufficiently low such that, even though some small percentage of customers will discontinue their service, that loss of business will be less than the additional revenues that result from the price increase being paid by customers who remain. AT&T's conduct with respect to these legacy POTS-type services demonstrates that the Company does not perceive them as being subject to so much competition that it must maintain its prices at competitive levels.

Additionally, even where some POTS customers are induced to seek an alternative service in response to a price increase, many will end up purchasing the substitute service from the same provider, AT&T California and/or its wireless affiliate, AT&T Mobility in this case. Indeed, one effect of raising the price of the legacy service is to reduce the *differential in price* between that service and the higher-priced digital service bundles, thus accelerating the migration of customers away from POTS. A companion strategy is to reduce the price of the substitute service – the AT&T Internet + Phone bundle in this case – while simultaneously raising the price of the legacy service. AT&T California has been doing just that, to the point where the price of its Internet + Phone bundles is often *lower* than the price of POTS, particularly when certain optional features and long distance services are included. Coupled with the deteriorating service quality associated with POTS services as discussed in Chapter 4A, the fact that AT&T has been able to profitably implement this succession of annual rate increases for more than a decade since the implementation of *URF* raises serious questions as to the Commission's conclusion in *URF* that competition had developed to a point where continued regulatory protection of basic residential telephone service prices is no longer required or appropriate.



The fact that AT&T has been able to profitably implement a succession of large annual legacy services rate increases for more than a decade since the implementation of *URF* raises serious questions as to the Commission's conclusion in *URF* that competition had developed to a point where continued regulatory protection of basic residential telephone service prices is no longer required or appropriate.

AT&T California has continued its practice of *disinvesting* in its California local network infrastructure.

Because AT&T California is a wholly-owned subsidiary of AT&T Inc., it is the parent AT&T Inc. that determines the amount of capital investment funds that will be available for local

infrastructure investment by its individual operating companies. AT&T California dividends out some portion of, all or, as has been the case in seven of the last ten years, more than all of its net operating income to its parent. Table 7.5 below summarizes AT&T California net income and dividend payments to its sole shareholder over the 2010-2019 period:

Table 7.5											
AT&T CALIFORNIA											
NET INCOME AND DIVIDEND PAYMENTS TO PARENT AT&T INC.											
2010-2019											
(\$000)											
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
AT&T-CA Net Income	(2,318,705)	(833,514)	(213,584)	1,531,443	608,020	1,921,482	1,493,479	1,210,137	2,191,808	1,021,129	6,611,695
Dividend paid to AT&T	1,355,722	0	0	0	1,354,158	1,527,615	1,861,782	1,507,216	2,149,652	1,282,762	11,038,907
Change in Retained Earnings	-3,674,407	-833,514	-213,584	+1,531,443	-746,138	+393,867	-368,303	-297,079	+42,156	-261,633	-4,427,212

Source: AT&T CA ARMIS Forms 43-02 as filed annually with CPUC.

Cumulatively, over the full 10-year period, AT&T California had total net after-tax income of \$6.1-billion, but paid out \$11.0-billion in dividends to its parent company, AT&T Inc, thereby eroding the California company's capital base by roughly \$4.4-billion and impairing its ability to maintain and upgrade its aging infrastructure.



Over the past two years (2018-19), AT&T California continued to disinvest from its network. The Company had total net after-tax income of \$3.21-billion, but paid out \$3.42-billion in dividends to its parent company, AT&T Inc -- i.e. it paid AT&T dividends that were some \$219.5-million more than the California company had earned from its ongoing operations.

Thus, rather than reinvesting a portion of its net income back into its network, AT&T California has been consistently *disinvesting* by paying out more in dividends to its sole stockholder than it generated as profits from its operations.



Between 2010 and 2019, AT&T California paid dividends to AT&T Inc. that exceeded its total net income over the period by roughly \$4.43-billion.

And this is not the only indication of a *disinvestment* policy on the part of AT&T, as is further demonstrated in Table 7.6 below, AT&T California has also been eroding its capital base by investing less in its infrastructure than its annual depreciation accruals and retirements:

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
BOY Gross Telecom Plant in Service (TPIS)	38,012,545	38,820,045	41,239,852	41,885,833	41,171,577	40,334,511	40,592,685	40,459,982	36,561,579	37,037,552
Gross Plant Additions	1,294,281	2,823,661	1,026,656	1,349,988	1,003,950	692,124	840,929	1,126,575	1,163,824	1,147,067
Retirements	(469,928)	(371,653)	(459,523)	(2,041,895)	(1,833,538)	(440,952)	(951,050)	(4,979,833)	(624,554)	(1,384,449)
Adjustments	(16,853)	(32,201)	70,848	(22,349)	(7,478)	7,002	(45,145)	(45,145)	(63,297)	(112,230)
EOY Gross Telecom Plant in Service	38,820,045	41,239,852	41,885,833	41,171,577	40,334,511	40,592,685	40,459,982	36,561,579	37,037,552	36,687,940
Annual TPIS depreciation accruals (acct 6561)	2,269,324	2,317,862	2,263,393	1,635,691	1,179,213	980,435	894,384	948,481	766,007	765,580
Cumulative depreciation reserve	30,725,620	33,919,953	35,789,894	35,483,033	35,212,622	35,737,860	35,667,638	31,669,055	26,815,887	26,286,667
Net EOY TPIS	8,210,895	7,428,989	6,220,114	5,811,622	5,179,915	4,921,048	4,856,389	4,973,372	10,321,702	10,438,665
Source: AT&T CA ARMIS 43-02 Reports, Table B-1, as filed annually with the CPUC										

Over the four-year period from 2016 through 2019, AT&T California recorded \$7.94-billion in total retirements, negative \$265.8-million in Transfers/Adjustments, and \$3.37-billion of depreciation accruals. Gross Plant Additions made over that same 4-year period were only \$4.28-billion, resulting in a plant erosion totaling at least \$7.3-billion. Gross Telecommunications Plant in Service carried on AT&T California's USOA books decreased by roughly \$3.9-billion from the beginning of 2016 through the end of 2019. Notably, *net plant* over that same period appears to have increased by \$5.5-billion, from \$4.9-billion to \$10.4-billion.

In order to explore this seemingly anomalous condition, CD submitted the following data request to AT&T California:

The amounts shown for Net EOY TPIS appear to show a substantial (\$5.3-billion) increase between 2017 and 2018, and an amount for 2019 that is similar in magnitude to that for 2018. Please provide the detailed accounting entries that produced this result, and provide a narrative explanation as to how Net TPIS could have increased by more than \$5-billion in a year when Gross Plant Additions were only \$1.6-billion, Retirements and Adjustments combined were slightly under \$700-million, and Depreciation Accruals were approximately \$766-million.

AT&T California provided the following explanation in response:

For 2018 data and beyond, per the FCC’s Decision 17-15, AT&T eliminated MR accounting (used for regulatory purposes) in favor of GAAP accounting (used for financial reporting). ... In computing net investment (gross investment less accumulated depreciation reserve), the primary difference between MR and GAAP is associated with the accumulated depreciation reserve. The MR accumulated depreciation reserves were significantly higher than the GAAP accumulated depreciation reserves due the difference in depreciation rates and depreciation calculation methodology.⁴⁸

AT&T California’s ARMIS Reports had, through 2017, been prepared in accordance with the FCC’s Uniform System of Accounts (USOA) as specified in Part 32 of the FCC’s Rules (47 CFR §32). (In its response AT&T refers to this as “MR.”) Although the CPUC has continued to require Price Cap ILECs (AT&T California and Frontier California and its predecessors) to continue to submit annual ARMIS-type reports even though this requirement had been discontinued by the FCC after 2007, AT&T California has apparently interpreted the FCC Decision 17-15 referenced in its response as permitting it to substitute Generally Accepted Accounting Principles (“GAAP”) for USOA accounting in the ARMIS-type reports submitted to the CPUC for 2018 and beyond. ETI does not offer an opinion as to the validity of AT&T’s interpretation. We would, however, make the following observations: It is customary practice for firms to identify any changes in accounting method(s) in notes to financial reports. The only reference to the use of GAAP accounting in AT&T California’s 2018 ARMIS filing appears in a footnote to the table entitled “Pole and Conduit Rental Calculation Information” that is included in the 2018 ARMIS Report 43-01, a location that would indicate that the change applies only to this specific Table. The footnote states that “Financial values reported on a GAAP basis beginning with 2018 data (per FCC decision 17-15).” We have been unable to find any similar notation as to the accounting change anywhere else in any of the Company’s 2018 Reports including, in particular, the 43-02 Report that was the subject of the above-reference data request. No notation of the accounting change appears anywhere in the 2019 AT&T California ARMIS Reports, not even in the counterpart of the Pole and Conduit Rental Table.

As AT&T California explains in its Response, “the primary difference between MR [USOA] and GAAP is associated with the accumulated depreciation reserve. The MR [USOA] accumulated depreciation reserves were significantly higher than the GAAP accumulated depreciation reserves due the difference in depreciation rates and depreciation calculation methodology.” What AT&T California appears to have done is to, in effect, back-cast the accumulated depreciation reserves for 2018 and 2019 *as if GAAP depreciation rules had been in effect prior to the 2018 accounting change.*

48. AT&T California Reponse to CD Data Request 12-A-4 dated August 7, 2020. The FCC Decision 17-15 to which AT&T refers is the February 24, 2017 *Report and Order* in WC Docket No. 14-130 (“*Comprehensive Review of the Part 32 Uniform System of Accounts*”) and CC Docket No. 80-286 (“*Jurisdictional Separations and Referral to the Federal-State Joint Board*”).

We reach this conclusion based upon the following analysis: The Accumulated Depreciation Reserves for 2016 was \$35.67-billion, dropping to \$31.69-billion a year later (2017), roughly a \$4-billion decrease. In 2017, AT&T California retired some \$4.98-billion in plant. Retirements *reduce* the accumulated depreciation reserve, in that case, by just under \$5-billion. In that same year, AT&T California took depreciation accruals of \$948-million, which would have *increased* the accumulated depreciation reserve by that amount. The net of these two items – plant retirements and annual depreciation accruals, roughly corresponds to the \$4-billion decrease in year-over-year depreciation reserve between 2016 and 2017.

However, if we now look at the figures for 2017 and 2018, we see an entirely different situation. The accumulated depreciation reserve for 2018, per the AT&T California ARMIS Report 43-02, was \$26.8-billion, a decrease of \$4.85-billion from the 2017 level. However, in 2018, AT&T California retired only \$624-million in plant retirements and \$766-million in annual depreciation accruals. But for the change from USOA to GAAP accounting, the net effect of these two items should have resulted in an *increase* in accumulated depreciation reserves of \$142-million, *not a decrease of \$4.85-billion*.



A change in the accounting procedures that AT&T California has utilized for its ARMIS-type reports after 2017 has resulted in a roughly \$5-billion overstatement of its net Telecommunications Plant in Service for 2018 and 2019.

Table 7.6A below presents approximate results for 2018 and 2019 on a *pro forma* basis as if USOA accounting continued to be utilized in 2018 and 2019. These results are approximate, and almost certainly *overstate* net Telecommunications Plant in Service for both of those years. Depreciation rates (and hence annual depreciation accruals) under GAAP tend to be lower than those applicable under USOA. Thus, had USOA accounting rules continued to be utilized in 2018 and 2019, the annual depreciation accruals for those years would almost certainly have been higher, resulting in lower end-of-year Net TPIS for both years.

Table 7.6A

**AT&T CALIFORNIA
PATTERN OF INVESTMENT 2010-2019
APPROXIMATE PRO FORMA ADJUSTMENTS
AS IF USOA ACCOUNTING RULES WERE STILL BEING USED
FOR 2018 AND 2019
(\$000)**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
BOY Gross Telecom Plant in Service (TPIS)	38,012,545	38,820,045	41,239,852	41,885,833	41,171,577	40,334,511	40,592,685	40,459,982	36,561,579	37,037,552
Gross Plant Additions	1,294,281	2,823,661	1,026,656	1,349,988	1,003,950	692,124	840,929	1,126,575	1,163,824	1,147,067
Retirements	(469,928)	(371,653)	(459,523)	(2,041,895)	(1,833,538)	(440,952)	(951,050)	(4,979,833)	(624,554)	(1,384,449)
Adjustments	(16,853)	(32,201)	70,848	(22,349)	(7,478)	7,002	(45,145)	(45,145)	(63,297)	(112,230)
EOY Gross Telecom Plant in Service	38,820,045	41,239,852	41,885,833	41,171,577	40,334,511	40,592,685	40,459,982	36,561,579	37,037,552	36,687,940
Annual TPIS depreciation accruals (acct 6561)	2,269,324	2,317,862	2,263,393	1,635,691	1,179,213	980,435	894,384	948,481	766,007	765,580
Cumulative depreciation reserve	30,725,620	33,919,953	35,789,894	35,483,033	35,212,622	35,737,860	35,667,638	31,669,055	31,810,508	31,191,639
Net EOY TPIS	8,210,895	7,428,989	6,220,114	5,811,622	5,179,915	4,921,048	4,856,389	4,973,372	5,227,044	5,496,301
Source: AT&T CA ARMIS 43-02 Reports, Table B-1, as filed annually with the CPUC, as adjusted to conform to USOA accounting rules,										

As noted, these adjusted USOA-type Net TPIS values for 2018 and 2019 likely overstate the amounts that would exist under strict USOA accounting. We do not have the means for estimating the 2018 and 2019 depreciation accruals that would have applied under USOA, so these approximations are as close as we can get with the information available. AT&T California did make Gross Plant Additions for 2018 and 2019 totaling some \$2.13-billion net of adjustments. However, only a small fraction of that spending appears to have been directed to legacy POTS services.

Inter-affiliate transactions at non-arm's length transfer prices also contribute to the parent company's pattern of disinvestment in AT&T California operations.

But even AT&T California's nominally reported revenues, expenses and net income cannot by themselves provide a complete or accurate picture of the ILEC entity's financial performance. This is because of the extensive nature and amount of inter-affiliate transactions that take place on an ongoing basis between the AT&T California ILEC entity and numerous other affiliates that are themselves, directly or indirectly, wholly owned by the parent company AT&T Inc. These transactions involve both *purchases* made by the ILEC from other AT&T affiliates as well as *sales* made by the ILEC to other AT&T affiliates. Table 7.7 below provides a summary of

these transactions and their relationship to AT&T California’s overall revenues, operating expenses, and net income.



AT&T California financial statements show an incomplete assessment of the ILEC’s financial condition due to the large volume of inter-affiliate transactions made at transfer prices that are not set on the basis of arm’s length negotiations.

AT&T’s ILECs are organized into a number of mostly state-level operating subsidiaries, although some of the AT&T ILEC entities provide service in several states. Other AT&T “service company” entities provide a range of centralized services to the ILECs as well as to other non-ILEC AT&T operations. The use of centralized services has a long history in the telecommunications industry, dating back to AT&T Bell System days, when the AT&T General Department provided a broad range of back-office services and Bell Laboratories provided centralized research and development for the entire AT&T corporate family. In theory, the use of centralized services should produce scale and scope efficiencies that would then benefit all of the affiliates that utilize these services. In practice, this is not always the case. AT&T, Verizon and their predecessors, in particular, have a long history of employing the use of centralized services organizations to extract profits from their operating telephone companies. In 2018 and 2019 alone, total AT&T California operating expenses (excluding depreciation and amortization) were \$7.16-billion. 58% of these, some \$4.15-billion, were spent on services purchased from other AT&T affiliates. In those same two years, AT&T California’s total operating revenues were \$12.43-billion, 16.17% of which, some \$2.01-billion were realized from sales to various other AT&T affiliates.

With the exception of tariffed switched and special access services that are being purchased from AT&T California by various other AT&T affiliates, the specific *transfer prices* at which these transactions are recorded can hardly be viewed as being set on the basis of arm’s length negotiations. Since both the seller and buyer in each instance are wholly-owned by the same parent company, the nominal transfer price has little or no effect upon the parent company’s bottom line. However, if it is the parent company’s goal to extract cash from the ILEC entity, setting an inflated transfer price for services the ILEC purchases from other AT&T affiliates, or heavily discounting the prices that the ILEC charges for whatever (non-tariffed) services it sells to other AT&T affiliates, can accomplish this as effectively as making a dividend payment to the parent, but with far less exposure as to the precise purpose of the policy. As Table 7.7 demonstrates, in six out of the last seven years, *more than 50% of AT&T California total operating expenses net of depreciation and amortization were paid over to other AT&T affiliates for services rendered*. Over the full 2010-2019 period, \$26.0-billion of the 58.3-billion of total AT&T California operating expenses (excluding depreciation and amortization) were spent on purchases of services from other AT&T affiliates.

Table 7.7

**AT&T CALIFORNIA
AFFILIATE TRANSACTIONS WITH OTHER UNITS OF AT&T INC.
2010-2019
(\$000)**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
AT&T-California operating revenue	9,696,777	9,754,246	9,373,754	9,580,095	9,641,220	10,007,776	9,440,692	8,626,042	\$5,799,249	\$6,628,969
Sales to other AT&T affiliate	2,978,741	2,942,621	1,566,044	1,700,570	1,645,297	1,864,210	1,967,601	1,681,965	977,436	1,032,465
Pct from sales to affiliates	30.72%	30.17%	16.71%	17.75%	17.07%	18.63%	20.84%	19.50%	16.85%	15.58%
AT&T CA pre-tax OpEx excl depr/amort ⁴⁹	10,715,929	5,688,139	6,899,881	4,736,569	7,025,256	5,241,041	5,575,240	5,267,556	3,319,424	3,836,668
Services Purchased from AT&T affiliates	2,122,027	2,458,684	2,712,380	2,657,560	2,884,788	3,185,779	3,135,299	2,762,898	1,891,939	2,260,675
Pct of total OpEx paid to affiliates	19.80%	43.22%	39.31%	56.11%	41.06%	60.79%	56.24%	52.45%	57.00%	58.92%
AT&T-CA Net Income	(2,318,705)	(833,514)	(213,584)	1,531,443	608,020	1,921,482	1,493,479	1,210,137	2,191,808	1,021,129

Source: AT&T CA ARMIS Form 43-02, Table I-2, Form 43-03, as filed annually with CPUC.

As we noted in our Phase 1 Report, that this type of manipulation may have occurred is hardly idle speculation. AT&T and its post-1984 RBOC offspring have a long history of such transactions. In pre-NRF general rate cases, the CPUC would routinely include an examination of affiliate transactions between AT&T California and other affiliates, and would in some cases adjust inter-affiliate transfer prices for regulatory purposes.⁵⁰ The fact that the CPUC continues

49. Amounts shown are calculated as Total Operating Expenses (Form 43-03 Line 720) – Depreciation/Amortization expenses (Form 43-03 Line 6560), which represents current cash operating expenses. The source data for this calculation is as follows:

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Pre-tax OpEx	13,010,515	8,006,001	9,163,274	6,356,472	8,216,812	6,212,753	6,469,624	6,206,258	4,085,431	4,602,248
Deprec/Amort of TPIS	2,294,586	2,317,862	2,263,393	1,619,903	1,191,556	971,712	894,384	938,702	766,007	765,580
Pre-tax OpEx excl depr/amort	10,715,929	5,688,139	6,899,881	4,736,569	7,025,256	5,241,041	5,575,240	5,267,556	3,319,424	3,836,668

50. As far back as 1968, for example, the CPUC had initiated an investigation into the prices being charged by Western Electric, then the AT&T manufacturing affiliate, for telecommunications equipment being purchased by (then) Pacific Telephone and Telegraph Company (PT&T). *Investigation into Practices and Contracts of PT&T Co.*, Case No. 8858, Decision No. 76726, January 27, 1970, 1970Cal. PUC LEXIS 86, 70 CPUC 644.

to collect information on, and monitor, both sales to and purchases from affiliates on an ongoing basis underscores the legitimacy of this concern.

Persistent disinvestment, extensive affiliate transactions at self-serving transfer prices, extraordinarily large rate increases, and deteriorating service quality all point to “harvesting” as AT&T California’s overarching strategy for its legacy services and customers.

These extensive affiliate transactions, the directly measurable indicators of disinvestment – depreciation accruals that exceed gross additions, payments of dividends to the parent company that exceed the nominally reported net income, and the persistent erosion of AT&T California’s Net Plant – and the deteriorating service quality overall – together compel certain conclusions as to AT&T California’s overall financial condition and investment policies:

- (1) The succession of annual rate increases applicable to AT&T California’s legacy POTS services were not in any sense cost-driven or cost-based, and instead appear to have been driven by the company’s pursuit of a harvesting strategy with respect to these services.
- (2) Earnings of this magnitude confirm that AT&T California’s harvesting strategy is achieving the intended increases in profitability without the need for the infusion of large amounts of new capital investment in the company’s local network infrastructure.
- (3) Persistent *disinvestment* in the AT&T California local network has been the principal source of the erosion in the net book value of the company’s Telecommunications Plant in Service and the resulting escalation of the result of return on its remaining net investment.
- (4) Persistent disinvestment, deterioration in service quality, and escalating prices for AT&T California’s basic residential services are not consistent with the level of competition that has been portrayed by AT&T California and that the Commission has accepted as a basis for its adoption and continuation of the Uniform Regulatory Framework.

AT&T California investment in wireline circuit-switched voice services has continued to diminish over the 2018-2019 period.

Under the FCC’s Uniform System of Accounts and associated financial reporting rules, large ILECs had been required to maintain a set of regulatory accounting records in a form established by the FCC, and to report various aspects of their capital investments among a number of functional categories.⁵¹ They had also been required to report, by category (USOA account),

51. To facilitate its regulatory mission, the FCC in 1935 established a “Uniform System of Accounts” (“USOA”) as detailed in Part 31 of its Rules (47 CFR § 31). In 1986, the USOA was revised and expanded, and Part 31 was superseded entirely by a new Part 32 (47 CFR § 32). The FCC also adopted a reporting protocol known as the

annual Gross Additions, Retirements, annual and cumulative Depreciation Accruals, and gross and net telecommunications plant in service (“TPIS”). Much of this information was also being maintained at the individual wire center level. AT&T California’s ARMIS type submissions to the CPUC, specifically its Forms 43-02, indicate that, over the 2010 through 2017 period, AT&T California made Gross Additions to its TPIS that were slightly over \$10-billion.⁵²

In 2017, the FCC determined that “price cap ILECs” – those large carriers that are subject to FCC price cap rather than rate-of-return regulation – will no longer be required to maintain separate USOA accounting records after 2017.⁵³ This study has benefitted greatly from the availability of ARMIS-type reporting by the two ILECs that are under examination here. Although the FCC no longer requires that AT&T California and Frontier California maintain accounting records pursuant to the USOA as it had existed prior to the 2017 ruling, the FCC Order explicitly provides that “[n]othing in this Order precludes a state or regulatory agency, or another party as part of a contractual requirement, from requiring a carrier to maintain the Class A accounts or otherwise maintain the USOA. See, e.g., 17 CFR § 1770.11 (requiring Rural Utility Service borrowers to maintain Class A accounts).”⁵⁴ And in her *Statement Approving in Part and Concurring in Part*, FCC Commissioner Mignon L. Clyburn remarked, “So to those carriers who advocate for decreased regulatory burdens, let me assure you: I am with you. However, the next time this Commission or a state commission asks for cost data, to support a rulemaking, investigate a complaint, or bring an enforcement action, I hope we do not hear protestations that the request is too burdensome because the data is not kept in the format that the FCC or state commission needs.”

One of our specific Phase I Recommendations was that the important role that the Part 32 accounting data has played in this study makes a compelling case that this and the associated ARMIS-type annual reporting be maintained in California. AT&T California has continued to submit annual ARMIS-type financial reports to this Commission based upon FCC Part 32 USOA

“Automated Reporting Management Information System” (“ARMIS”). In 2007 the FCC decided that it would forbear from requiring ARMIS reporting by ILECs after 2007. *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; Petition of Qwest Corporation for Forbearance from Enforcement of the Commission’s ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c)*, WC Docket No. 07-139 *et al. Memorandum Opinion and Order and Notice of Proposed Rulemaking*, Rel. September 6, 2008, FCC 08-203: However, Part 32 USOA requirements remained in effect, and state commissions were not precluded from continuing to require such reporting. The CPUC has required that URF ILECs, including AT&T California and Verizon (now Frontier) California continue to submit ARMIS-type reports on an annual basis. See, GO 104-A, D. 93-02-019.

52. AT&T California Forms 43-02 as submitted to the CPUC for 2010-2017.

53. *I/M/O Comprehensive Review of the Part 32 Uniform System of Accounts*, WC Docket No. 14-130; *Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, *Report and Order*, FCC 17-15, Rel. February 24, 2017.

54. *Id.*, at 7, fn. 51.

accounting records although, as discussed above, the Company has apparently substituted GAAP reporting for Part 32 at least with respect to its balance sheet accounts..

Table 7.8 below provides a comparison of the distribution of gross plant additions among the various USOA account categories over the 2010-2017 Phase 1 period with those made during 2018-2019. AT&T California Gross Telecommunications Plant in Service (“TPIS”) Additions amounted to some \$10.16-billion over the Phase 1 2010-2017 study period. \$4.21-billion, about 41.5%, of these gross plant additions were directed toward central office switching and circuit equipment (“COE”); roughly the same amount (\$3.92-billion, about 38.6%) was spent on Cable and Wire Assets – i.e., outside plant. However, that pattern saw a major shift over the Phase 2 2018-2019 study period. Total Gross Plant Additions for both years combined were only \$2.3-billion. Only \$201-million (8.7%) was directed toward COE, whereas the outside plant Cable & Wire component represented some 77.6% of total Gross Additions, some \$1.79-billion.

Over the 2010-2017 period, the two largest areas of investment were in Account 2212 – Digital Electronic Switching (\$1.48-billion) and in Account 2232 – Circuit Equipment \$2.69-billion). Account 2212 is further broken down into two subaccounts – Account 2212.1 – Circuit Switching, and Account 2212.2 – Packet Switching. The majority of new Digital Switching investment over the 2010-2017 period was for Packet Switches, although in 2018-2019 the Company spent more on circuit switching equipment than on packet switching. Notably, Packet Switches, which are used to support VoIP, Internet access and various other advanced services, are *not* used in the provision of basic local POTS services. Account 2232 (Circuit Equipment) is defined as including, principally, “equipment which is used to reduce the number of physical pairs otherwise required to serve a given number of subscribers by utilizing carrier systems, concentration stages or combinations of both. It shall include equipment that provides for simultaneous use of a number of interoffice channels on a single transmission path. ...

Account 2232 is also broken down into two subaccounts – subaccount 2232.1 includes Electronic Circuit Equipment; Subaccount 2232.2 includes Optical Circuit Equipment. Although the data suggest that the bulk of AT&T’s investment in circuit equipment has been on the electronic, rather than optical, side as noted in Table 7.8, that is not likely the case. 47 CFR §32.2232(d) provides that “Circuit equipment that converts electronic signals to optical signals or optical signals to electronic signals shall be categorized as electronic – shall be assigned to subaccount 2232.1–Electronic Circuit Equipment.” Given that AT&T has been engaged in a major fiber optic upgrade both in feeder and in many distribution routes, it is highly likely that the bulk of Subaccount 2232.2 gross additions have involved circuit equipment that converts between electronic and optical signals. And although this equipment is undoubtedly being used by AT&T to provide circuit-switched legacy POTS-type services, the drivers for these upgrades has clearly been the company’s pursuit of nonregulated broadband and other advanced services markets.

Table 7.8

**AT&T CALIFORNIA
DISTRIBUTION OF GROSS PLANT ADDITIONS
2010-2017 COMPARED WITH 2018-2019**

Account	Account description	2010-2017		2018-2019	
		Gross Adds	Pct of Total	Gross Adds	Pct of Total
TPIS - General Support Assets					
		-		-	
2111	Land	171	0.00%	800	0.03%
2112	Motor vehicles	240,745	2.37%	4,289	0.19%
2113	Aircraft	-	0.00%	-	0.00%
2114	Tools and other work equipment	93,597	0.92%	13,662	0.59%
2121	Buildings	594,211	5.85%	129,266	5.59%
2122	Furniture	443	0.00%	-	0.00%
2123	Office equipment	1,745	0.02%	34	0.00%
2124	General purpose computers	43,434	0.43%	133	0.01%
	TOTALS -- General Support Assets	974,346	9.59%	148,184	6.41%
-	-	-		-	
TPIS - Central Office Assets					
		-		-	
2211	Non-digital switching	214	0.00%	9	0.00%
2212.1	Circuit Switching	148,894	1.47%	49,935	2.16%
2212.2	Packet Switching	1,335,116	13.14%	35,826	1.55%
2220	Operator Systems	1	0.00%	-	0.00%
2231	Radio systems	31,664	0.31%	13,149	0.57%
2232.1	Electronic circuit	2,695,654	26.54%	102,072	4.42%
2232.2	Optical circuit	1,024	0.01%	99	0.00%
	TOTALS -- Central Office Equipment	4,212,567	41.47%	201,090	8.70%
-	-	-		-	
TPIS - Information Origination/Termination Assets					
		-		-	
2311	Station apparatus	-	0.00%	-	0.00%
2321	Customer premises wiring	-	0.00%	-	0.00%
2341	Large private branch exchanges	9,406	0.09%	-	0.00%
2351	Public telephone terminal equipment	53	0.00%	-	0.00%
2362	Other terminal equipment	893,336	8.79%	154,561	6.69%
	TOTALS -- Information Orig/Termination Assets	902,795	8.89%	154,561	6.69%
-	-	-		-	
TPIS - Cable and Wire Assets					
		-		-	
2411	Poles	495,031	4.87%	188,569	8.16%
2421	Aerial cable	840,574	8.27%	378,053	16.36%
2422	Underground cable	1,572,375	15.48%	603,621	26.12%
2423	Buried cable	364,234	3.59%	260,928	11.29%
2424	Submarine and deep sea cable	14	0.00%	-	0.00%
2426	Intrabuilding network cable	17,397	0.17%	43,081	1.86%
2431	Aerial wire	11	0.00%	-	0.00%
2441	Conduit systems	631,674	6.22%	318,206	13.77%
	TOTALS -- Cable and Wire Assets	3,921,310	38.60%	1,792,458	77.57%
-	-	-		-	
TPIS Amortizable Assets					
		-		-	
2681	Capital leases	-	0.00%	-	0.00%
2682	Leasehold Improvements	52,439	0.52%	2,077	0.09%
2690.1	Network Software	71,203	0.70%	12,521	0.54%
2690.2	General purpose computer software	23,504	0.23%	-	0.00%
	TOTALS -- Amortizable Assets	147,146	1.45%	14,598	0.63%
-	-	-		-	
	TOTAL TPIS Gross Plant Additions	10,158,164	100.00%	2,310,891	100.00%

Source: AT&T California Responses to CD DR-03A, DR 11-A.



Those capital investments that AT&T has been making in its California ILEC have, for the most part, not been directed at legacy basic voice services.

Table 7.5 above showed that AT&T California has been steadily disinvesting in its local network. AT&T-California has been consistently paying dividends to its parent AT&T Inc. that exceed its net earnings. Between retirements and annual depreciation accruals, there are more assets being written off and depreciated than are being acquired. Depreciation is an operating expense, but since it does not involve any immediate cash outlay (as is the case for most other types of operating expenses), depreciation provides, in effect, a source of cash that can be used for plant upgrades and replacements. Here, however, AT&T California's Gross Additions are consistently falling below its ongoing depreciation accruals.

Investments at individual wire centers

AT&T was asked to, and did, provide certain investment- and asset-related data at the individual wire center level. This included Gross Additions (by account), Retirements, and Operating Expenses including annual depreciation charges. Wire centers vary in size from a few hundred to tens of thousands of access lines. In order to compare AT&T's investment practices across all of its wire centers, we used the switched access lines in service as of January 2019 for each of AT&T California's wire centers, representing the mid-point of the Phase 2 study period, which runs from January 2018 through and including December 2019. We compared total Gross Additions made over the two-year period with the January 2019 number of lines in service.

Table 7.9 below provides a summary by USOA account of total 2018-2019 Gross Additions. These figures were compiled from the account- and wire center-level data provided by AT&T California in response to CD data request 11-A-08. They do not appear to correspond precisely with the Form 43-02 ARMIS reports. The Form 43-02 submissions indicated that for 2018 and 2019 combined, AT&T California had Gross Additions of roughly \$2.3-billion. However, from the AT&T California response to CD data request 11-A-08, only about \$1.95-billion in Gross Additions (including transfers from Plant Under Construction) for the same period have been identified.

Tables 7.10 through 7.12 below provide the total and per-access line Gross Additions made over the 2018-2019 Phase 2 study period, based upon January 2019 access lines in service. Table 7.10 provides data for individual wire centers sorted alphabetically by CLLI code. Tables 7.11 and 7.12 provide the same data sorted by total Gross Additions for each wire center (Table 7.11) and by the average Gross Addition per January 2019 switched access line in service (Table 7.12). There is, as it turns out, an extraordinarily wide variation in the per-access line investment across the full scope of AT&T California's 615 wire centers, ranging from \$18.46 for the Bradley wire center (BRDLCA90) to \$51,653 in the Parkway wire center (SNRFCA11) per average access line (see Table 7.12 below). Fourteen AT&T California wire centers show

negative Gross Additions for 2018-2019, which is likely due to accounting adjustments. Many individual wire centers show negative Gross Additions for one or more USOA accounts.

Account	Description	2018-2019 Gross Addition	
2003	Telecommunications plant under construction	(49,196,524)	
C O E	2211	Non-digital COE	282,463
	2212.1	COE - Circuit Switching	52,584,580
	2212.2	COE - Packet Switching	31,044,715
	2231	Radio systems	7,634,061
	2232.1	Circuit Equipment - Electronic	64,113,984
	2232.2	Circuit Equipment - Optical	1,109,626
O S P	2411	Poles	188,569,073
	2421	Aerial Cable	378,052,487
	2422	Underground Cable	603,621,152
	2423	Buried Cable	260,927,836
	2426	Intra-building Network Cable	43,080,835
	2441	Conduit Systems	318,205,818
TOTAL (incl. transfers from Plant Under Construction)		1,949,226,650	
Central Office Equipment -- Total		8.04% 156,769,449	
Outside Plant -- Total		91.96% 1,792,457,201	

The AT&T accounting data upon which these tables are based provides, in addition to specific figures for each of its roughly 615 wire centers, additional amounts that are not wire center-specific. Approximately 97 entries are not associates with specific wire centers. These entries combined represent a *negative* \$156.46-million of Gross Additions.

Table 7.10 GROSS PLANT ADDITIONS BY WIRE CENTER - 2018-2019 (continued)

CLLI	WC No.	WC Name	County	Jan 2019 ALE	\$ per AL	TOTAL	2008	2011	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
FREDCA01	707300	Fairfield	Solano	5,082	841.62	3,260,691	2,929,988	606	(284,923)	22,122	2,931	23,212	22,122	24,221	24,422
FRGLCA11	510002	French Glenn	Shasta	14,622	147.26	2,150,338	1,538,196	-	(41,436)	21,923	1,130	23,322	21,923	24,221	24,422
FRGLCA12	510003	French Glenn	Shasta	7,855	171.54	1,339,362	5,819,567	-	(65,538)	230,784	611,989	233,222	230,784	24,221	24,422
FRMTCA12	610015	French Adams Oliver 12	Alameda	6,839	938.54	6,419,649	5,819,567	(559)	(245,912)	(132,360)	1,130	23,322	(10,355)	24,221	24,422
FRSACA01	616451	Fair Oaks	Sacramento	7,463	525.25	3,919,940	8,167,884	221	(56,572)	7,911,944	910,851	6,332	22,323	4,512	4,512
FRSACA02	591688	Fair Oaks	Fresno	7,818	888.88	6,879,085	8,167,884	1,266	(1,734,519)	(258,479)	(1,924,515)	6,968	10,261	9,922	9,922
FRSACA03	591769	Fair Oaks	Fresno	5,377	871.58	4,686,483	6,879,085	7	(1,800,576)	(30,384)	2,727,738	13,009	4,507	173	173
FRSACA04	591770	Fair Oaks	Fresno	4,088	672.96	2,727,071	4,081,050	-	(1,481,153)	(30,448)	(221,610)	3,897	29,895	840	4,662
FRSACA05	591781	Fair Oaks	Fresno	3,388	528.42	1,761,011	3,388,589	7	(128,594)	90,911	(62,310)	300	(30,210)	4,331	4,331
FRSACA06	591782	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA07	591783	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA08	591784	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA09	591785	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA10	591786	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA11	591787	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA12	591788	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA13	591789	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA14	591790	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA15	591791	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA16	591792	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA17	591793	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA18	591794	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA19	591795	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA20	591796	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA21	591797	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA22	591798	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA23	591799	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA24	591800	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA25	591801	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA26	591802	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA27	591803	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA28	591804	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA29	591805	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333
FRSACA30	591806	Fair Oaks	Fresno	1,078	788.44	838,842	1,078,589	-	(30,448)	50,911	(62,310)	20	5,685	1,333	1,333



Table 7.10 GROSS PLANT ADDITIONS BY WIRE CENTER - 2018-2019 (Continued)

GLI	WC No	WC Name	County	Jan 2019 ALS	\$ per AL	TOTAL	2011	2012	2013	2014	2015	2016	2017	2018	U S O A Plant Account				2426	2433	2441
															2232.2	2232.1	2232.2	2232.2			
SDNCA06	619781	SDNG 27th Street	San Diego	3,852	147,23	561,881	-	(448,317)	-	(3,011,902)	-	1,702	38,659	7,885	72,884	3,303	72,884	(4,309)			
SDNCA06	619782	SDNG College Street	San Diego	2,586	97,92	255,232	-	16,193	-	34,629	-	3,370	7,982	7,982	1,168	97,92	(4,309)				
SDNCA06	619783	SDNG College Street	San Diego	2,586	97,92	255,232	-	16,193	-	34,629	-	3,370	7,982	7,982	1,168	97,92	(4,309)				
SDNCA12	619784	SDNG Tompason	San Diego	2,849	1,815,22	5,168,737	-	(89,914)	-	(143,542)	-	4,200	137,600	158,102	3,615	1,815,22	140,985				
SDNCA16	897856	SDNG Regatta	San Diego	6,954	782,70	5,442,898	994	(561,449)	-	(483,771)	-	757	24,229	24,229	697	84,575	(448,479)				
SDNCA16	89786	SDNG Mira Mesa	San Diego	5,310	750,10	4,363,789	984	(76,104)	-	(483,771)	-	21,720	34,606	34,606	326	1,319	2,665				
SDNCA01	415058	SF Bush Pine	San Francisco	14,854	1,138,87	16,926,638	1,686	(162,996)	-	(1,866,347)	-	224	2,867	2,867	471	11,087	2,865				
SDNCA01	415059	SF Market Midoppin	San Francisco	10,682	441,92	4,844,311	301	(125,038)	-	(3,925,604)	-	280	3,926	3,926	3,743	288,886	47,754				
SDNCA05	415060	SF Wilsson 25th St	San Francisco	10,992	896,36	11,874,890	141	(125,014)	-	(470,421)	-	2,867	3,926	3,926	(21,976)	55,361	300,450				
SDNCA05	415061	SF Wilsson 25th St	San Francisco	10,992	896,36	11,874,890	141	(125,014)	-	(470,421)	-	2,867	3,926	3,926	(21,976)	55,361	300,450				
SDNCA05	415062	SF Larkin Steiner	San Francisco	22,366	40,42	90,402	-	(692,860)	-	(4,704,704)	-	4,510	42,283	42,283	6,661	5,005	661				
SDNCA13	415063	SF Evergreen 9th Ave	San Francisco	9,168	595,10	5,466,598	-	945	-	(47,440)	-	293	10,672	10,672	8,571	63,560	557				
SDNCA13	415064	SF Greenough 18th	San Francisco	11,765	563,34	6,627,746	-	(100,886)	-	(195,600)	-	327	29,635	29,635	48,508	1,514	11,086				
SDNCA17	415066	SF Folom	San Francisco	4,510	876,52	3,954,588	-	(1,157,897)	-	(1,210,610)	-	4	76	76	253	1,514	11,086				
SDNCA01	626538	San Gabriel	San Francisco	7,656	743,60	5,694,544	4,175	(1,157,897)	-	(1,210,610)	-	6,028	426	426	55	760,894	92,016				
SDNCA01	626539	San Gabriel	San Francisco	7,656	743,60	5,694,544	4,175	(1,157,897)	-	(1,210,610)	-	6,028	426	426	55	760,894	92,016				
SDNCA01	631127	San Juan Bautista	San Benito	384	781,23	299,991	-	5,256	-	8,509	-	1,559	5	5	10,589	-	328				
SDNCA02	408128	San Jose Main	San Jose	12,910	1,590,68	20,440,620	(678)	(171,510)	-	(541,032)	-	221	21,969	21,969	957,354	4,808	155,086				
SDNCA02	408129	San Jose White Rd	San Jose	8,051	1,233,48	9,930,714	-	(296,244)	-	(140,603)	-	5,742	9,148	9,148	37,556	7,756	(171,074)				
SDNCA12	408130	San Jose Dali Way	San Jose	13,089	708,10	8,794,154	-	(93,173)	-	(135,117)	-	4,910	17,319	17,319	2,135	47,663	47,663				
SDNCA13	408131	San Jose Clynworth	San Jose	7,594	629,02	4,776,788	-	(1,103,274)	-	(30,445)	-	1,128	(709)	12,490	289	20,530	(2,002)				
SDNCA14	408132	San Jose Foworth	San Jose	9,411	1,080,96	9,990,956	(649)	(138,857)	-	(384,231)	-	2,366	21,385	21,385	6,532	80,857	80,989				
SDNCA14	408133	San Jose Foworth	San Jose	9,411	1,080,96	9,990,956	(649)	(138,857)	-	(384,231)	-	2,366	21,385	21,385	6,532	80,857	80,989				
SDNCA18	408134	San Jose Avenue Valley	San Jose	2,177	1,131,26	3,254,697	141	(6,178)	-	(568,213)	-	395	74,759	74,759	145	19,484	25,684				
SDNCA21	408145	San Jose Junction	San Jose	6,140	5,600,42	34,386,605	-	(192,243)	-	(63,712)	-	87	14,705	14,705	11,138,304	204,940	11,684				
SDNCA22	408146	San Jose Bailey	San Jose	149	2,050,61	305,541	-	(6,309)	-	(33,906)	-	180	7	7	14,705	2,664	11,684				
SDNCA11	831135	San Lucas	Monterey	43	825,32	35,489	-	6,096	-	(11,038)	-	7,064	6,239	6,239	16	2,889	12,566				
SDNCA11	831136	San Lucas	Monterey	43	825,32	35,489	-	6,096	-	(11,038)	-	7,064	6,239	6,239	16	2,889	12,566				
SDNCA01	805389	San Luis Obispo	San Luis Obispo	4,352	185,866	8,095,235	-	(44,337)	-	93,123	-	277	50,272	50,272	1,064	2,927	29,292				
SDNCA01	805390	San Luis Obispo	San Luis Obispo	4,352	185,866	8,095,235	-	(44,337)	-	93,123	-	277	50,272	50,272	1,064	2,927	29,292				
SDNCA01	807629	San Marcos	San Diego	4,889	1,217,65	5,855,202	-	(3,478)	-	(2,022)	-	15,913	5,221	5,221	12,456	22,860	33,474				
SDNCA11	805390	San Luis Obispo	San Luis Obispo	5,400	687,89	3,714,400	-	(92,398)	-	(6,807)	-	1,029	9,972	9,972	9,067	92,689	871,841				
SDNCA11	805391	San Luis Obispo	San Luis Obispo	5,400	687,89	3,714,400	-	(92,398)	-	(6,807)	-	1,029	9,972	9,972	9,067	92,689	871,841				
SDNCA01	310659	San Mateo	San Mateo	7,900	1,287,30	10,168,670	1	(20,994)	-	(47,589)	-	895	12,959	12,959	76	92,689	871,841				
SDNCA01	310660	San Mateo	San Mateo	7,900	1,287,30	10,168,670	1	(20,994)	-	(47,589)	-	895	12,959	12,959	76	92,689	871,841				
SDNCA01	419572	San Rafael Main	San Rafael	4,857	432,31	2,099,720	-	7,982	-	(37,862)	-	13,912	1,428	1,428	5,191	223	223				
SDNCA01	419573	San Rafael Main	San Rafael	4,857	432,31	2,099,720	-	7,982	-	(37,862)	-	13,912	1,428	1,428	5,191	223	223				
SDNCA01	419574	San Rafael Main	San Rafael	4,857	432,31	2,099,720	-	7,982	-	(37,862)	-	13,912	1,428	1,428	5,191	223	223				
SDNCA01	925074	San Ramon	San Ramon	3,199	2,382,39	15,897,846	48,946	(32,128)	-	(160,207)	-	89,091	445	445	2,490	3,392	445				
SDNCA01	925075	San Ramon	San Ramon	3,199	2,382,39	15,897,846	48,946	(32,128)	-	(160,207)	-	89,091	445	445	2,490	3,392	445				
SDNCA01	707320	Santa Rosa Main	Sonoma	11,549	2,748,14	31,728,254	-	(380,633)	-	(221,384)	-	210,131	56,374	56,374	9,933	9,575	12,190				
SDNCA01	707319	Santa Rosa Main	Sonoma	11,549	2,748,14	31,728,254	-	(380,633)	-	(221,384)	-	210,131	56,374	56,374	9,933	9,575	12,190				
SDNCA01	408143	Santa Clara Spacepark	Santa Clara	4,768	871,64	4,175,155	(20,132)	(11,891)	-	1,222	-	22	22	22	280	5,164	(10,088)				
SDNCA01	408134	Santa Clara Bellony	Santa Clara	8,974	811,64	7,285,695	-	(860,670)	-	(4,589,487)	-	14	126,241	126,241	656	6,837	202,827				
SDNCA01	408135	Santa Clara Bellony	Santa Clara	8,974	811,64	7,285,695	-	(860,670)	-	(4,589,487)	-	14	126,241	126,241	656	6,837	202,827				
SDNCA01	408136	Carro Sunnyside	Santa Clara	7,759	1,099,80	9,622,720	-	(86,895)	-	(117,889)	-	95	3,382	3,382	17,723	5,411	378,952				
SDNCA01	408137	Carro Sunnyside	Santa Clara	7,759	1,099,80	9,622,720	-	(86,895)	-	(117,889)	-	95	3,382	3,382	17,723	5,411	378,952				
SDNCA01	618794	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				
SDNCA12	707323	Santa Clara Sunnyvale	Santa Clara	1,383	2,598,59	3,760,809	769	(2,567)	-	(188,628)	-	168	26,045	26,045	(2,203)	(1,867)	(1,867)				

Table 7.10 GROSS PLANT ADDITIONS BY WIRE CENTER -- 2018-2019 (continued)

CLLI	WC No.	WC Name	County	Jan 2019 ALS	\$ per AL	TOTAL	2008	2011	2012	2013	2014	2015	2016	2017	2018	2019	U S O A Plant Account	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008							
HLRCA01	707328	Ukiah Main	Mendocino	3,947	446.78	1,765,438	2,016,107	332	(13,411)	(79,773)	8,516	(188,386)	1,560	7,307	11,255	7,307															2,700					
HLRCA02	707329	Capella Ivanhoe	Mendocino	1,633	246.26	402,126	457,530	35	(28,248)	36	(3,274)	(28,248)	1,560	7,307	11,255	7,307																2,700				
HLRCA03	707330	Ukiah	Mendocino	4,893	808.13	3,956,024	4,461,254	581	(28,248)	(191,697)	341	(8,801)	19	1,865	4,945	1,865	108,633																700			
HLRCA04	707331	Upper Lake	Mendocino	388	1,400.32	543,323	547,637	-	2,314	-	-	(6,801)					215,318															6,358				
VCLCA01	707330	Vacaville	Solano	5,328	728.95	3,836,945	4,017,091	3	(246,783)	(38,267)	(2,148)	76,532	368	5,517	3,180	15,095																	6,358			
VCLCA02	707331	Vina	Tehama	69	728.95	50,297	45,698	1,222	280	-	831	(66,931)	1,889	10,629	4,049	188																				
VCLCA03	707332	Windsor	Tulare	6,971	1,025.05	7,145,650	7,216,338	-	12,675	(48,331)	831	(86,931)	1,889	10,629	4,049	188																				
VCLCA04	707333	Windsor	Tulare	5,720	324.71	1,857,335	3,236,642	-	(121,729)	(454,862)	(341)	(1,429,129)	(287)	136	4,857	5,550	16,640																			
VCLCA05	707334	Windsor	San Diego	2,486	811.72	2,008,300	1,129,468	-	(11,107)	(15,668)	(341)	(269,670)	136	309,384	4,049	212	492,159																			
VCLCA06	707335	Windsor	San Diego	1,180	1,180.00	1,386,000	1,180,000	-	(3,333)	(3,333)	786	11,782	(38)	2,539	2,182	1,782	883																			
VCLCA07	707336	Windsor	San Diego	10,188	1,165.59	11,876,538	7,245,027	336	5,449	(468,754)	10,770	37,226	402	688	2,934	475	14,731																			
VCLCA08	707337	Windsor	Ventura	2,965	1,657.99	4,914,211	4,321,679	-	(62,185)	(62,666)	-	-	1,607	0	124	9																				
VCLCA09	707338	Windsor	Ventura	4,798	1,113.36	5,341,917	5,373,324	-	4,102	(69,173)	-	(2,657)	1,607	0	124	9																				
VCLCA10	707339	Windsor	Sonoma	1,844	228.78	420,966	444,542	-	4,100	-	-	(84,426)	511	-	-	-	-																			
VCLCA11	707340	Windsor	Calaveras	1,100	653.92	718,316	799,131	-	4,100	-	-	(219,419)	511	-	-	-	-																			
WLCRCA01	209234	Valley Springs	Mariposa	267	1,857.20	493,828	2,238,727	-	(8,330)	296	-	30,236	2,129	24,882	3,000	24,882																				
WLCRCA02	209235	Wawona	Mariposa	447	1,042.46	467,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA03	530323	Woodland	Yuba	7,439	1,085.45	8,170,445	4,711,807	-	(78,255)	(78,255)	-	129,893	6,344	718	(19,912)	146																				
WLCRCA04	530324	Woodland	Yuba	4,359	1,085.45	4,711,807	4,711,807	-	(27,182)	-	-	129,893	6,344	718	(19,912)	146																				
WLCRCA05	530325	Woodlake	Yuba	533	1,085.45	578,431	822,431	-	1,001	728	-	6,211	200	2,268	11,721	4																				
WLCRCA06	707333	Weed	Tulare	847	70.80	59,972	110,125	-	(1,285)	-	-	(50,109)	-	292	2,259	8,278																				
WLCRCA07	707334	Weed	Tulare	847	70.80	59,972	110,125	-	(1,285)	-	-	(50,109)	-	292	2,259	8,278																				
WLCRCA08	707335	Weed	Humboldt	63	718.72	45,343	35,267	932	(801,077)	(814,193)	-	(996,426)	5,254	89,749	621	(44,080)																				
WLCRCA09	707336	Weed	Humboldt	63	718.72	45,343	35,267	932	(801,077)	(814,193)	-	(996,426)	5,254	89,749	621	(44,080)																				
WLCRCA10	707337	Weed	Century City	5,791	1,146.54	6,639,585	9,074,026	-	45,343	-	121,473	-	9,499	5,254	89,749	621																				
WLCRCA11	81401	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA12	81402	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA13	81403	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA14	81404	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA15	81405	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA16	81406	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA17	81407	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA18	81408	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA19	81409	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA20	81410	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA21	81411	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA22	81412	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA23	81413	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA24	81414	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA25	81415	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA26	81416	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA27	81417	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	24,882																				
WLCRCA28	81418	Walker Basin	Ken	447	1,104.46	492,789	351,179	-	(1,769)	-	-	4,715	2,129	24,882	3,000	2																				

Table 7.10 GROSS PLANT ADDITIONS BY WIRE CENTER -- 2018-2019 (continued)

CLLID	WC No.	WC Name	County	Jan 2019 AL	TOTAL	2009	2011	2011.1	2011.2	2011	2012	2012.1	2012.2	2012	2013	2013.1	2013.2	2013	2014		
				\$ per AL																	
RSMDCA0N	<<Location not specified or not Wire Center specifi>>				1,807	1,807															
RSVCCAZ2	<<Location not specified or not Wire Center specifi>>				11,103	11,103															
RSVCCAZ2	<<Location not specified or not Wire Center specifi>>				12,413	12,413															
SFSPGCA0	<<Location not specified or not Wire Center specifi>>				(1,492)	(1,492)															
SFSPGCA0	<<Location not specified or not Wire Center specifi>>				(1,390,792)	(1,390,792)															
SHOKCA02	<<Location not specified or not Wire Center specifi>>				(222)	(222)															
SHOKCA04	<<Location not specified or not Wire Center specifi>>				3,182	3,182															
SKTCCANZ	<<Location not specified or not Wire Center specifi>>				2,730	2,730															
SLBHCAXF	<<Location not specified or not Wire Center specifi>>				6,207	6,207															
SMBBCCAF	<<Location not specified or not Wire Center specifi>>				38,942	38,942															
SMBBCCAF	<<Location not specified or not Wire Center specifi>>				13,121	13,121															
SNDMCCAF	<<Location not specified or not Wire Center specifi>>				5,043	5,043															
SNDMCCAF	<<Location not specified or not Wire Center specifi>>				7,252	7,252															
SNFCCAG5	<<Location not specified or not Wire Center specifi>>				23,011	23,011															
SNFKCA27	<<Location not specified or not Wire Center specifi>>				33,436	33,436															
SNMKCAKJ	<<Location not specified or not Wire Center specifi>>				372	372															
SNMKCAKJ	<<Location not specified or not Wire Center specifi>>				10,711	10,711															
SNMKCAKJ	<<Location not specified or not Wire Center specifi>>				168	168															
SNMKCAKJ	<<Location not specified or not Wire Center specifi>>				37	37															
SZZZCAZ2	<<Location not specified or not Wire Center specifi>>				135,514,396	(2,018,820,893)	90,207	16,777,593	91,590,739	2,576,937	94,135,732	81,178	187,212,568	477,860,140	697,104,082	226,904,091	242	242	242	241	244
THKCA010	<<Location not specified or not Wire Center specifi>>				6,613	6,613															
THKCA010	<<Location not specified or not Wire Center specifi>>				39	39															
WHTRCA0F	<<Location not specified or not Wire Center specifi>>				148	148															
WHTRCA0F	<<Location not specified or not Wire Center specifi>>				1,792	1,792															
WHTRCA0J	<<Location not specified or not Wire Center specifi>>				488	488															
WHTRCA0J	<<Location not specified or not Wire Center specifi>>				488	488															
WLANCCAF	<<Location not specified or not Wire Center specifi>>				3,978	3,978															
WLANCCAF	<<Location not specified or not Wire Center specifi>>				3,978	3,978															
WLANCCAF	<<Location not specified or not Wire Center specifi>>				1,654	1,654															
WLANCCAF	<<Location not specified or not Wire Center specifi>>				4,443	4,443															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				973	973															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				4,951	4,951															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				2,619	2,619															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				26,496,946	26,496,946															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				(291,727,880)	(291,727,880)															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				(1,319,951,101)	(1,319,951,101)															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				396	396															
WLNTCCAF	<<Location not specified or not Wire Center specifi>>				(1,296)	(1,296)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				1	1															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				36,238	36,238															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(1,185)	(1,185)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(211)	(211)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(747)	(747)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(747)	(747)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(218)	(218)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				1,481	1,481															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				2	2															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(148)	(148)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(107)	(107)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				1,944	1,944															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(482)	(482)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(277)	(277)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(277)	(277)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(2,793)	(2,793)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				3,329	3,329															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(526)	(526)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				(23,585)	(23,585)															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				110	110															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				14	14															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				404	404															
WMLNCCAF	<<Location not specified or not Wire Center specifi>>				5,841	5,841															
TOTALS					1,900,005,105	(48,196,524)	282,463	52,564,580	31,044,715	7,651,061	64,113,964	1,109,626	188,560,073	378,052,467	603,621,152	260,927,836	242	242	242	241	244

Sources: AT&T-CA Response to DR 11-A-8.



Table 17.12

AT&T CALIFORNIA

GROSS PLANT ADDITIONS BY WIRE CENTER -- 2018-2019

GLI	WC No.	WC Name	County	Jan 2019	AL	1st	AL	TOTAL	2003	2011	2012	2013	2014	2015	2016	2017	2018	2019
SNRCA11	415023	Palmdale	Kern	2,956	51,654.16	45,945	52,162.68	12,088,768	1,653,616	20,455,427	29,741	86,142,937	50,011	19,395	12,592	863	19	3,870
FRSGCA11	530486	Palmdale Main	Kern	1,089	17,476.98	17,869,213	(42,233)	17,455,044	17,869,213	444,164	37,713	83,234	1,400	13,385	12,592	19	3,870	
FRSGCA11	530485	Palmdale Gluch	Kern	82	14,072.54	735,138	3,896	1,153,948	735,138	230,784	146,884	83,234	1,400	13,385	12,592	19	3,870	
SNRCA11	530427	Arvin	Kern	1,747	11,899.01	9,397,696	(14,694)	20,877,586	9,397,696	2,078	4,984	146,884	130,531	6,784	16,107	147,078	8,534	346,501
FRSGCA11	530428	Arvin Main	Kern	1,509	6,890.02	3,779,816	(4,694)	12,918,416	3,779,816	1,453	14,533	8,534	2,154	1,787	1,787	2,154	1,787	2,154
SNRCA11	408145	San Jose Junction	Santa Clara	6,140	5,600.24	24,029,055	(162,243)	34,388,605	24,029,055	(162,243)	(16,226)	(17,788)	1	87	14,705	111,393,304	204,940	11,684
SNRCA11	408146	Burrell	Fresno	88	4,783.12	424,946	(3,261)	3,261	424,946	197	(1,788)	(1,788)	1	87	14,705	111,393,304	204,940	11,684
TRNDCA11	707326	Trinidad	Humboldt	298	1,284.032	1,284,032	1,238	7,462	1,284,032	10,107	10,107	4	25	4	25	4	25	4
ESPRCA11	530450	Esposito	Yuba	268	4,340.77	1,149,865	(2,592)	1,154,613	1,149,865	(2,592)	(2,592)	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865
SNRCA11	530451	Esposito	Yuba	268	4,340.77	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865	1,149,865
CRCTCA2	510011	Crockett	Contra Costa	288	3,848.57	1,112,238	(161,432)	4,437,409	1,112,238	(161,432)	(161,432)	(77)	213	(1,869)	(1,869)	(1,869)	(1,869)	(1,869)
SNRCA11	916538	Rio Linda	Sacramento	1,163	3,815.48	4,437,409	4,437,409	4,437,409	4,437,409	10,846	10,846	10,846	10,846	10,846	10,846	10,846	10,846	10,846
BEALCA11	530431	Beale	Yuba	78	3,654.11	285,020	3,036	3,036	285,020	243,750	16,051	16,051	16,051	16,051	16,051	16,051	16,051	16,051
OTMSCA11	619883	City Mesa	San Diego	998	3,502.83	3,453,787	(11,034)	22,612	3,453,787	22,612	22,612	22,612	22,612	22,612	22,612	22,612	22,612	22,612
HRSGCA11	530432	Hesperowood	Humboldt	729	3,453.96	3,453,960	1,826	73,857	3,453,960	73,857	73,857	73,857	73,857	73,857	73,857	73,857	73,857	73,857
HRSGCA11	530433	Hesperowood	Humboldt	729	3,453.96	3,453,960	1,826	73,857	3,453,960	73,857	73,857	73,857	73,857	73,857	73,857	73,857	73,857	73,857
APTSYCA12	831100	Arpa	Santa Cruz	2,684	3,241.31	9,283,117	(99,589)	6,804	9,283,117	6,804	6,804	6,804	6,804	6,804	6,804	6,804	6,804	6,804
SNRCA11	209223	Stockton Redwood	San Joaquin	1,471	3,218.11	4,733,841	101,452	101,452	4,733,841	101,452	101,452	101,452	101,452	101,452	101,452	101,452	101,452	101,452
SNRCA11	831107	Stockton	Monterey	1,012	3,211.08	3,349,595	(190)	101,452	3,349,595	101,452	101,452	101,452	101,452	101,452	101,452	101,452	101,452	101,452
SNRCA11	619777	SNDC C Street	San Diego	5,277	3,112.27	17,514,442	(90,114)	43,185	17,514,442	43,185	43,185	43,185	43,185	43,185	43,185	43,185	43,185	43,185
SNRCA11	619778	SNDC C Street	San Diego	5,277	3,112.27	17,514,442	(90,114)	43,185	17,514,442	43,185	43,185	43,185	43,185	43,185	43,185	43,185	43,185	43,185
MOJUCA11	663376	Morgan Park	Kern	581	2,938.78	1,071,432	(2,391)	140,238	1,071,432	140,238	140,238	140,238	140,238	140,238	140,238	140,238	140,238	140,238
SNRCA11	619754	National City Highland	San Diego	1,415	2,904.11	4,109,314	1,145	1,145	4,109,314	1,145	1,145	1,145	1,145	1,145	1,145	1,145	1,145	1,145
SNRCA11	707320	Santa Rosa Main	Sonoma	11,549	2,748.14	31,238,254	(390,633)	221,304	31,238,254	221,304	221,304	221,304	221,304	221,304	221,304	221,304	221,304	221,304
CAMPAC11	619715	Campo	San Diego	474	2,742.83	1,900,100	24,053	1,344	1,900,100	24,053	24,053	24,053	24,053	24,053	24,053	24,053	24,053	24,053
ASPLCA11	591352	Sierra Ah Mtn	Fresno	1,852	2,742.70	4,480	(17,256)	4,480	4,480	4,480	4,480	4,480	4,480	4,480	4,480	4,480	4,480	4,480
SNRCA11	805394	Compton	San Luis Obispo	1,435	2,659.30	3,616,092	(92,361)	509	3,616,092	509	509	509	509	509	509	509	509	509
CANTCA11	310609	Compton	California	9,869	2,657.63	26,935,937	(82,361)	509	26,935,937	509	509	509	509	509	509	509	509	509
ANRCA11	714703	Anahim La Palma	Orange	1,791	2,647.33	4,135,391	2,724	2,724	4,135,391	2,724	2,724	2,724	2,724	2,724	2,724	2,724	2,724	2,724
POBACA11	893763	Hortland	San Diego	1,548	2,599.89	1,419,299	117,637	2,697	1,419,299	117,637	117,637	117,637	117,637	117,637	117,637	117,637	117,637	117,637
SNRCA11	619752	San Marcos	San Diego	1,548	2,599.89	1,419,299	117,637	2,697	1,419,299	117,637	117,637	117,637	117,637	117,637	117,637	117,637	117,637	117,637
MRDMCA11	209196	San Marcos	Contra Costa	5,298	2,520.72	13,554,795	4,242,092	5,890	13,554,795	4,242,092	4,242,092	4,242,092	4,242,092	4,242,092	4,242,092	4,242,092	4,242,092	4,242,092
SNRCA11	510052	Richmond SF	Contra Costa	7,128	2,505.49	17,866,249	120,786	161,741	17,866,249	161,741	161,741	161,741	161,741	161,741	161,741	161,741	161,741	161,741
BELTCA11	323604	Beil	Los Angeles	2,448	2,469.08	6,046,788	(165,238)	79,863	6,046,788	79,863	79,863	79,863	79,863	79,863	79,863	79,863	79,863	79,863
SILVCA11	714797	Silverado	Orange	191	2,463.82	470,590	226	226	470,590	226	226	226	226	226	226	226	226	226
FRNACA11	993736	Fontana	San Bernardino	5,940	2,439.24	14,458,157	(4,594)	9,363	14,458,157	9,363	9,363	9,363	9,363	9,363	9,363	9,363	9,363	9,363
FRNACA11	993737	Fontana	San Bernardino	5,940	2,439.24	14,458,157	(4,594)	9,363	14,458,157	9,363	9,363	9,363	9,363	9,363	9,363	9,363	9,363	9,363
YMTCA11	209240	Yuba Springs	Maricopa	529	2,390.13	1,264,378	5,602	5,602	1,264,378	5,602	5,602	5,602	5,602	5,602	5,602	5,602	5,602	5,602
CTVLCA11	209161	Colville	Maricopa	663	2,271.59	7,270,721	(43,328)	4,865	7,270,721	4,865	4,865	4,865	4,865	4,865	4,865	4,865	4,865	4,865
COTNCA11	3205	Colton	San Bernardino	3,205	2,265.56	7,270,721	(43,328)	4,865	7,270,721	4,865	4,865	4,865	4,865	4,865	4,865	4,865	4,865	4,865
NSRCA11	916557	North Natoms	Sacramento	2,047	2,200.95	4,661,648	(13,745)	(6,804)	4,661,648	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)
NSRCA11	916558	North Natoms	Sacramento	2,047	2,200.95	4,661,648	(13,745)	(6,804)	4,661,648	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)	(6,804)
YRBCA11	530504	Yuba City MO	San Joaquin	1,314	2,176.39	2,909,728	(4,211)	4,211	2,909,728	4,211	4,211	4,211	4,211	4,211	4,211	4,211	4,211	4,211
SNRCA11	916541	Stanford Ranch	Placer	3,201	2,156.98	6,904,429	(33,560)	1,250	6,904,429	1,250	1,250	1,250	1,250	1,250	1,250	1,250	1,250	1,250
SNRCA11	916542	Stanford Ranch	Placer	3,201	2,156.98	6,904,429	(33,560)	1,250	6,904,429	1,250	1,250	1,250	1,250	1,250	1,250	1,250	1,250	1,250
CHVSCA12	619783	Chukva Vista	San Diego	2,184	2,122.93	4,638,474	4,298,151	115	4,638,474	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151
CHVSCA12	619784	Chukva Vista	San Diego	2,184	2,122.93	4,638,474	4,298,151	115	4,638,474	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151	4,298,151
OLDCA11	661383	Export Oldale	Kern	2,258	2,110.11	4,764,628	(15,057)	1,113	4,764,628	1,113	1,113	1,113	1,113	1,113	1,113	1,113	1,113	1,113
SNRCA11	619779	Export Oldale	Kern	2,258	2,110.11	4,764,628	(15,057)	1,113	4,764,628	1,113	1,113	1,113	1,113	1,113	1,113	1,113	1,113	1,113
AGORCA11	619800	Azusa	Los Angeles	4,658	2,068.67	10,649,583	(163,008)	510	10,649,583	510	510	510	510	510	510	510	510	510
ORNDCA11	925042	Orinda	Contra Costa	1,932	2,060.19	3,980,284	(648)	(648)	3,980,284	(648)	(648)	(648)	(648)	(648)	(648)	(648)	(648)	(648)
SNRCA11	408142	San Jose Bailey	Santa Clara	2,668	2,050.61	305,541	(6,309)	8,496	305,541	8,496	8,496	8,496	8,496	8,496	8,496	8,496	8,496	8,496
SNRCA11	619782	SNDC College	San Diego	1,548	2,040.94	5,236,796	(4,975)	8,496	5,23									

Table 7.12 GROSS PLANT ADDITIONS BY WIRE CENTER -- 2018-2019 (Continued) (Sorted by Average Gross Addition expenditure per switched access line -- Largest to smallest)

GLU	WG No.	WG Name	County	Jan 2019 A/S	\$ Per A/S	2018	2019	2019.2	2019.1	2019.2	2019.1	2019.2	2019.1	2019.2	2019.1	2019.2	2019.1	2019.2
INVRCA11	415020	Inverness	Marin	10	117.37	2,447	13,112	2,030	2,030	13,533								
INVRCA11	415020	Inverness	Marin	447	117.37	52,463	73,904	(841)	2,030	(22,842)								
CWLDCA12	209162	Crow Landing	Stanislaus	91	90.35	81,402	107,000	(563)	7,416	(14,807)								
BLRSCA12	430433	Blairland	Plumas	901	90.35	81,402	65,533		17,965									
SBHCA11	415076	Shirley Beach	Main	1,202	84.42	101,473	90,322	2,302	4,204	4,544								
ILLTNC11	550471	Ilwaco	Clatsop	546	75.77	41,373	29,302	11,251	10,608									
TRUEDCA12	530516	North Star	Placer	609	75.29	45,622	38,589	2,346	4,355									
WEEUCA11	530518	Weed	Siskiyou	847	70.80	59,972	110,125	(1,285)	7,851	(9,078)								
WAGCA11	530529	Wagon Wheel	Siskiyou	534	70.96	37,881	31,909	7,851	(979)									
SPKCA11	530492	Spokane	Plumas	2,882	48.05	138,199	151,886	13,687	13,685									
SPKCA11	530492	Spokane	Plumas	2,882	48.05	138,199	151,886	13,687	13,685									
SPKCA11	530492	Spokane	Plumas	2,882	48.05	138,199	151,886	13,687	13,685									
SPKCA11	530492	Spokane	Plumas	2,882	48.05	138,199	151,886	13,687	13,685									
SPKCA11	530492	Spokane	Plumas	2,882	48.05	138,199	151,886	13,687	13,685									
JAMLCA12	619851	Jamul	San Diego	22,936	40.42	904,052	6,715,966	(82,238)	910	(4,704,704)								
BRDLCA30	865363	Bradley	Monterey	458	18.45	8,381	24,381	507	(6,286)									
IMPERCA11	780742	Haville	Imperial	438	(17.12)	(7,400)	102,942	(4,085)	(30,002)									
IMPERCA11	780742	Haville	Imperial	438	(17.12)	(7,400)	102,942	(4,085)	(30,002)									
IMPERCA11	780742	Haville	Imperial	438	(17.12)	(7,400)	102,942	(4,085)	(30,002)									
IMPERCA11	780742	Haville	Imperial	438	(17.12)	(7,400)	102,942	(4,085)	(30,002)									
IMPERCA11	780742	Haville	Imperial	438	(17.12)	(7,400)	102,942	(4,085)	(30,002)									
BYPRCA11	865362	Bywood Park	San Luis Obispo	920	(125.84)	(115,774)	212,993	1,765	(203,810)									
PLTNCA13	920563	Pleasanton Hacienda	Alameda	1,821	(144.37)	(234,029)	1,458,330	(196,259)	(196,259)									
GZLLCA11	44	Gazelle	Siskiyou	44	(218.14)	(9,598)	4,221	(1,135)	(1,135)									
SNVACA11	408139	North Valley	San Joaquin	1,602	(283.40)	(443,238)	1,103,283	(8,887)	(8,887)									
HYVRCA11	510018	Hayward Depot	Alameda	5,288	(360.70)	(1,906,648)	1,764,753	(8,949)	(8,949)									
IRVNCAG11	949897	Inver AirPort	Orange	5,656	(423.09)	(2,392,931)	3,491,352	(2,577,057)	(2,577,057)									
LSNCA03	213825	Madison 03 MA	Los Angeles	5,672	(428.88)	(2,392,931)	3,491,352	(2,577,057)	(2,577,057)									
IMPERCA11	780855	Imperial	Imperial	83	(514.07)	(42,668)	32,901	(21,914)	(21,914)									
IMPERCA11	780855	Imperial	Imperial	83	(514.07)	(42,668)	32,901	(21,914)	(21,914)									
IMPERCA11	780855	Imperial	Imperial	83	(514.07)	(42,668)	32,901	(21,914)	(21,914)									
IMPERCA11	780855	Imperial	Imperial	83	(514.07)	(42,668)	32,901	(21,914)	(21,914)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)	(386,659)									
LAZNCAG11	818820	La Canada Oak Grove	Los Angeles	34	(8,896.15)	(304,546)	200,239	(386,659)										

GO 133-D §9.7 Alternative Investments

As we discussed in our Phase 1 Report, in August 2016, the Commission issued a revised GO 133-D that imposes financial penalties upon ILECs that persistently fail to meet minimal POTS service quality standards. GO-133-D §§9.3, 9.4 and 9.5 provide for escalating daily fines where a carrier's failure to meet the required service standards persists for an extended period of time.⁵⁵ A total of \$9.1-million in fines was assessed against AT&T California since this provision became effective.⁵⁶ §9.7 allows offending carriers to submit an "Alternative Proposal for Mandatory Corrective Action" whereby carriers can avoid the fine by agreeing to invest an amount of at least double the fine if such an investment will be effective in remedying the service problem for which the fine had been imposed. This "alternative" opportunity is initiated by the carrier by submitting "a request to suspend the fine." Under this provision,

... carriers may propose, in their annual fine filing, to invest no less than twice the amount of their annual fine in a project (s) which improves service quality in a measurable way within 2 years. The proposal must demonstrate that 1) twice the amount of the fine is being spent, 2) the project (s) is an incremental expenditure with supporting financials (e.g. expenditure is in excess of the existing construction budget and/or staffing base), 3) the project (s) is designed to address a service quality deficiency and, 4) upon the project (s) completion, the carrier shall demonstrate the results for the purpose proposed.⁵⁷

Carriers can avoid fines either by meeting the GO-133-D §3 performance standards or by investing in network upgrades that will result in improved service quality overall. These investments must, however, be directed specifically at services that fall within the scope of GO 133-D, i.e., legacy circuit-switched voice lines. AT&T California has sought approval of alternative proposals for mandatory corrective action under § 9.7 in lieu of paying the assessed fines in 2017, 2018 and 2019, and the Commission has approved all of these requests. CD has been tracking the effectiveness of such "alternative investments" in improving service quality, but most of these projects have been completed so recently (or are still ongoing) that no conclusion as to their effectiveness in improving service quality can be drawn at this time.

55. D.16-08-021 (R.11-12-001), Adopted Aug. 18, 2016; Effective Aug. 18, 2016; Except Section 9 on fines, which is effective Jan. 1, 2017.

56. Resolution T-17625, issued November 8, 2018; Resolution T-17655, issued June 3, 2019; Resolution T-17721, issued December 17, 2020.

57. GO 133-D, §9.7.

Table 7.13 below provides a summary of the specific alternative investments that have been made by AT&T California during 2018-2019. A total of 100 AT&T California wire centers have been the recipients of these “alternative investments” over this two-year period. Based upon January 2019 access line counts, these wire centers served 481,441 access lines, representing 25.1% of the total 1,915,900 switched access lines that were being served by AT&T California at that time.

Table 7.14 provides the 2018-2019 GO 133-D §9.7 amounts together with 2018-2019 service quality metrics for each of the same 100 wire centers using five service quality metrics as presented earlier in Table 4A.6. The five metrics are (1) Out-of-Service per 100 Access Lines per month; (2) Out-of-Service over 24-hours per 100 Access Lines per month; (3) Percent Out-of-Service Conditions Cleared Within 24 Hours; (4) Days Required to Clear 90% of Out-of-Service Conditions; and (5) Average Out-of-Service Duration (in minutes). We have sorted the table by the Percent Out-of-Service Conditions Cleared Within 24 Hours. GO 133-D requires that 90% of all Out-of-Service conditions be cleared within 24 hours, a condition that AT&T California has never come even close to achieving.

Table 7.13

AT&T CALIFORNIA

GO 133-D \$9.7 "ALTERNATIVE PROPOSED INVESTMENTS"
2018-2019

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
408132	SNJSCA14	San Jose Foxworthy	Santa Clara	9,411	151,565	564,078	26.87%
530494	RDBLCA01	Red Bluff	Tehama	3,745	123,883	121,506	101.96%
916479	NSCRCA11	Wabash	Sacramento	7,088	95,277	412,604	23.09%
559245	FRSNCA14	Fresno West Highway City	Fresno	3,283	80,144	335,224	23.91%
530489	PLVLCA11	Placerville Main	El Dorado	7,102	78,185	445,092	17.57%
714789	SNANCA11	Bristol	Orange	9,617	73,863	264,596	27.92%
650006	BRLNCA01	Burlingame	San Mateo	7,936	72,737	106,149	68.52%
415061	SNFCCA06	SF Juniper Onondaga	San Francisco	11,364	67,367	293,567	22.95%
916502	SCRMCA13	SCRM Fruitridge	Sacramento	2,983	62,711	127,645	49.13%
559228	THRRCA11	Three Rivers	Tulare	609	59,250	99,547	59.52%
916451	FROKCA11	Fair Oaks	Sacramento	7,463	56,582	362,215	15.62%
310609	CMTNCA01	Compton	Los Angeles	9,969	51,395	1,171,795	4.39%
831102	BLCKCA11	Boulder Creek	Santa Cruz	1,051	51,244	106,508	48.11%
707292	FTBRCA02	Fort Bragg	Mendocino	3,227	49,006	571,959	8.57%
831141	WTVLCA01	Watsonville	Santa Cruz	7,582	48,755	199,766	24.41%
661367	DELNCA11	Delano	Tulare	1,939	48,637	230,364	21.11%
619700	ALPICA12	Alpine	San Diego	1,624	47,280	118,847	39.78%
530441	CTWDCA11	Cottonwood	Tehama	2,138	45,885	116,846	39.27%
650024	LSATCA11	Los Altos	Santa Clara	4,386	45,785	236,071	19.39%
530457	GRTWCA11	Georgetown	El Dorado	1,339	40,908	100,410	40.74%
650010	COLACA01	Colima Daly City	San Mateo	5,878	39,715	159,553	24.89%
916482	ORVACA11	Orangevale	Sacramento	2,287	39,700	90,970	43.64%
916536	FLSMCA14	Folsom Blue Ravine	Sacramento	1,768	39,374	49,751	79.14%
818648	NORGCA11	Northridge	Los Angeles	10,424	37,683	986,797	3.82%
650016	HMBACA12	Half Moon Bay	San Mateo	2,349	37,312	91,019	40.99%
408130	SNJSCA12	San Jose Dial Way	Santa Clara	13,069	36,755	282,004	13.03%
530504	SGSPCA11	Shingle Springs	El Dorado	3,431	34,518	268,615	12.85%
831126	SNCZCA11	Santa Cruz Capitola	Santa Cruz	4,979	32,778	126,850	25.84%
707321	SBSTCA11	Sebastapoli	Sonoma	2,794	32,610	351,030	9.29%

Table 7.13 GO 133-D \$9.7 "ALTERNATIVE PROPOSED INVESTMENTS" 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
707290	FRFDCA01	Fairfield	Solano	5,082	32,398	345,379	9.38%
916478	NHLDCA11	Edgewood N Highl	Sacramento	4,053	31,539	368,641	8.56%
916499	SCRMCA03	SCRM Garden	Sacramento	8,642	31,091	487,675	6.38%
530475	NVCYCA11	Nevada City	Nevada	3,415	29,760	175,423	16.96%
619752	LAMSCA01	La Mesa	San Diego	5,791	29,460	338,207	8.71%
530459	GRVYCA01	Grass Valley	Nevada	7,879	28,787	284,966	10.10%
707304	LWLKCA11	Lower Lake	Lake	1,965	27,689	308,029	8.99%
951765	PDLYCA11	Pedley	Riverside	2,466	27,450	435,505	6.30%
707315	PNARCA11	Point Arena	Mendocino	597	26,725	83,477	32.01%
916453	FLSMCA12	Folsom Nimbus	Sacramento	1,844	26,554	114,499	23.19%
530528	CNVYCA11	Central Valley	Shasta	1,528	23,261	47,627	48.84%
209236	WLLCCA11	Wallace	Calaveras	400	23,151	44,903	51.56%
925079	WNCKCA11	Wainut Creek	Contra Costa	11,153	22,950	506,532	4.53%
530469	LSMLCA11	Los Molinos	Tehama	355	21,947	46,593	47.10%
559194	MADRCA11	Madera Main	Madera	3,987	21,845	685,245	3.19%
510001	ALBYCA11	Albany Solano	Alameda	6,236	21,550	92,458	23.31%
408129	SNJSCA11	San Jose White Rd	Santa Clara	8,051	21,239	312,421	6.80%
661402	WASCCA01	Wasco	Kern	774	20,085	66,272	30.31%
818652	RESDCA01	Reseda	Los Angeles	10,038	19,900	602,866	3.30%
559159	CLVSCA11	Clovis	Fresno	8,311	19,168	881,838	2.17%
626658	SNGBCA01	San Gabriel	Los Angeles	4,610	19,071	235,554	8.10%
707317	RIDECA11	Rio Dell	Humboldt	238	18,122	32,097	56.46%
530531	RDNGCA11	Redding Enterpr	Shasta	3,279	18,119	70,508	25.70%
661384	PLDLCA01	Palmdale	Los Angeles	4,380	17,422	371,660	4.69%
323635	LSANCA14	LSAN Adams	Los Angeles	3,816	17,409	218,231	7.98%
707328	UKIHCA01	Ukiah Main	Mendocino	3,947	17,349	316,473	5.48%
714804	SNANCA12	Santa Ana West SNAN Bolsa	Orange	2,806	16,598	74,071	22.41%
858750	LAJLCA11	La Jolla Girard	San Diego	3,647	16,281	63,981	25.45%
530522	WNTRCA11	Winters	Yolo	734	16,119	63,060	25.56%
707297	HLBGCA11	Healdsburg	Sonoma	2,672	16,075	162,508	9.89%
818610	CNPKCA01	Canoga Park	Los Angeles	13,344	16,043	1,356,631	1.18%
559188	LEMIRCA11	Lemore Main	Kings	1,200	15,802	156,276	10.11%
818662	VNNYCA02	Van Nuys	Los Angeles	10,196	15,266	529,734	2.88%
209234	VYSPCA11	Valley Springs	Calaveras	1,100	14,574	92,954	15.68%
949731	ELTRCA11	El Toro	Orange	10,967	14,400	161,360	8.92%
760758	OCSDCA11	Oceanside Mission	San Diego	4,352	14,021	330,986	4.24%
530535	GRVYCA12	Wildwood	Nevada	1,442	13,769	76,597	17.98%
951721	CORNCA11	Corona	Riverside	10,738	12,733	1,015,536	1.25%

Table 7.13 GO 133-D \$9.7 "ALTERNATIVE PROPOSED INVESTMENTS" 2018-2019 (continued)						
WC	CLLI	WC Name	County	GO 133-D \$9.7		Pct GO 133-D \$9.7
				Jan 2019 Access Lines	"Alternative Investments"	
				Other Rehab Expenditures		
559213	PTVLA11	Porterville	Tulare	4,993	12,698	5.89%
619744	IMBHCA11	Imperial Beach	San Diego	2,049	12,190	12.22%
707280	BNVLA11	Boonville	Mendocino	645	12,118	9.99%
916498	SCRMCA02	SCRM Ivanhoe	Sacramento	7,391	11,948	4.76%
530485	ORVLA12	Oroville East	Butte	1,522	11,418	8.18%
707287	CTTICA12	Cotati	Sonoma	1,983	11,393	16.00%
415060	SNFCCA05	SF Mission 25th St	San Francisco	10,082	10,859	4.39%
619723	CRNDCA11	Coronado	San Diego	1,724	10,589	76.52%
707307	MKVLCA11	McKinleyville	Humboldt	1,103	9,736	20.76%
619718	CHVSCA11	Chula Vista Third Avenue	San Diego	3,894	8,957	5.42%
951774	RVSDECA01	Riverside Orange	Riverside	7,926	8,685	1.82%
559168	FRSNCA01	Fresno Main	Fresno	7,618	8,285	1.06%
323641	LSANCA34	LSAN Angeles	Los Angeles	9,593	8,133	2.17%
707288	ELK CA11	Elk	Mendocino	211	8,060	95.08%
310664	WLMGCA01	Wilmington	Los Angeles	5,429	7,678	2.07%
626611	ELMNCA01	El Monte	Los Angeles	9,210	7,436	2.86%
530438	CHICCA01	Chico Main	Butte	10,221	6,955	2.42%
805385	PSRBCA01	Paso Robles	San Luis Obispo	4,945	6,585	1.19%
831100	APTSCA12	Aptos	Santa Cruz	2,864	6,466	8.46%
805399	VNTRCA11	Ventura Main Montalvo	Ventura	4,798	6,318	2.14%
408138	SNVACA01	Carrol Sunnyvale	Santa Clara	7,759	6,195	4.20%
619719	CHVSCA12	Chula Vista Apache	San Diego	2,258	5,956	13.53%
530490	PLVLA12	Placerville Niagara	El Dorado	2,240	5,875	2.66%
415059	SNFCCA04	SF Market McCoppin	San Francisco	10,962	5,814	1.16%
323626	LSANCA05	LSAN Pleasant	Los Angeles	6,868	5,382	2.32%
805391	SATCCA12	Saticoy	Ventura	1,946	5,363	4.41%
510002	ALMDCA11	Alameda Central	Alameda	6,355	5,120	2.76%
209184	KNFYCA11	Knights Ferry	Stanislaus	141	4,871	67.33%
530466	LSTNCA11	Lewiston	Trinity	508	4,855	32.52%
619729	ELGJCA11	El Cajon	San Diego	4,004	4,702	1.44%
831105	CRMLCA11	Carmel Main	Monterey	4,592	4,577	1.13%
760730	ELCNCA01	El Centro	Imperial	3,848	2,151	1.38%
760792	SNMCCA11	San Marcos	San Diego	4,889	1,511	0.36%
TOTALS 2018-2019				481,441	2,725,499	9.88%
				27,587,249		

Table 7.14

AT&T CALIFORNIA

2018-2019 SERVICE QUALITY METRICS IN WIRE CENTERS RECEIVING
GO 133-D \$9.7 "ALTERNATIVE PROPOSED INVESTMENTS"
(Sorted by Percent Cleared within 24 Hours)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratin (mins)
707315	PNARCA11	Point Arena	Mendocino	597	26,725	83,477	1.980	1.647	16.84%	12.384	7611
707288	ELK CA11	Elk	Mendocino	211	8,060	8,477	2.919	2.387	18.24%	11.566	6991
530466	LSTNCA11	Lewiston	Trinity	508	4,855	14,930	2.125	1.713	19.38%	11.266	6539
707280	BNVLC A11	Boonville	Mendocino	645	12,118	121,299	3.165	2.401	24.14%	11.625	6784
530490	PLVLC A12	Placerville Niagara	El Dorado	2,240	5,875	220,920	3.597	2.726	24.20%	14.327	8389
530485	ORVLC A12	Oroville East	Butte	1,522	11,418	139,512	4.615	3.473	24.73%	7.371	5200
530457	GRTWCA11	Georgetown	El Dorado	1,339	40,908	100,410	3.634	2.695	25.83%	10.774	6103
530528	CNVYCA11	Central Valley	Shasta	1,528	23,261	47,627	3.063	2.188	28.55%	11.247	6530
530441	CTWDCA11	Cottonwood	Tehama	2,138	45,885	116,846	4.168	2.899	30.43%	10.798	6043
707297	HLBGCA11	Healdsburg	Sonoma	2,672	16,075	162,508	2.146	1.487	30.70%	12.027	6738
530489	PLVLC A11	Placerville Main	El Dorado	7,102	78,185	445,092	3.304	2.255	31.75%	11.220	6008
530475	NVCYCA11	Nevada City	Nevada	3,415	29,760	175,423	2.253	1.533	31.94%	10.568	6208
209184	KNFYCA11	Knights Ferry	Stanislaus	141	4,871	7,234	1.307	0.881	32.56%	11.337	5356
619700	ALPICA12	Alpine	San Diego	1,624	47,280	118,847	2.653	1.780	32.88%	8.889	4594
619744	IMBHCA11	Imperial Beach	San Diego	2,049	12,190	99,724	1.205	0.808	32.89%	8.658	4835
530504	SGSPCA11	Shingle Springs	El Dorado	3,431	34,518	268,615	2.457	1.643	33.15%	9.754	5323
559213	PTVLC A11	Porterville	Tulare	4,993	12,698	215,603	1.704	1.129	33.72%	5.636	3738
707287	CTTICA12	Cotati	Sonoma	1,983	11,393	71,216	0.934	0.615	34.15%	10.814	6074
619723	CRNDCA11	Coronado	San Diego	1,724	10,589	13,839	0.632	0.415	34.34%	8.908	4732
707292	FTBRCA02	Fort Bragg	Mendocino	3,227	49,006	571,959	1.683	1.104	34.38%	10.582	5569
626658	SNGBCA01	San Gabriel	Los Angeles	4,610	19,071	235,554	1.066	0.698	34.53%	7.009	4213
858750	LAJLCA11	La Jolla Girard	San Diego	3,647	16,281	63,981	0.847	0.553	34.67%	8.289	4915
559228	THRRCA11	Three Rivers	Tulare	609	59,250	99,547	4.800	3.132	34.74%	4.526	3252
650024	LSATCA11	Los Altos	Santa Clara	4,386	45,785	236,071	1.791	1.165	34.95%	7.699	4780
530459	GRVYCA01	Grass Valley	Nevada	7,879	28,787	284,966	2.152	1.396	35.11%	9.388	5271
619718	CHVSCA11	Chula Vista Third Avenue	San Diego	3,894	8,957	165,333	1.307	0.840	35.75%	7.363	4346
209234	VYSPCA11	Valley Springs	Calaveras	1,100	14,574	92,954	2.855	1.826	36.04%	8.161	4479
650016	HMBACA12	Half Moon Bay	San Mateo	2,349	37,312	91,019	1.016	0.643	36.74%	8.396	4429
530531	RDNGCA11	Redding Enterpr	Shasta	3,279	18,119	70,508	1.331	0.841	36.87%	8.762	5025
530535	DLRYCA11	Wildwood	Nevada	1,442	13,769	76,597	1.920	1.211	36.92%	10.608	5521
530438	CHICCA01	Chico Main	Butte	10,221	6,955	287,579	1.386	0.874	36.92%	6.730	4497
619719	CHVSCA12	Chula Vista Apache	San Diego	2,258	5,956	44,012	0.575	0.362	36.94%	7.266	4589
408130	SNUSCA12	San Jose Dial Way	Santa Clara	13,069	36,755	282,004	1.215	0.763	37.23%	7.501	4516
626611	ELMNCA01	El Monte	Los Angeles	9,210	7,436	260,083	1.346	0.840	37.59%	7.765	4360
619752	LAMSCA01	La Mesa	San Diego	5,791	29,460	338,207	1.118	0.697	37.68%	6.954	4025
619729	ELCJCA11	El Cajon	San Diego	4,004	4,702	326,642	1.303	0.811	37.72%	6.534	3873
707317	RIDECA11	Rio Dell	Humboldt	238	18,122	32,097	0.790	0.491	37.78%	4.104	2423

Table 7.14 2018-2019 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" WIRE CENTERS (continued)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct. Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratin (mins)
559188	LEMRC11	Lemore Main	Kings	1,200	15,802	156,276	2,229	1,379	38.11%	6.113	3645
831102	BLCKCA11	Boulder Creek	Santa Cruz	1,051	51,244	106,508	2,189	1,332	39.18%	6.996	4119
323641	LSANCA34	LSAN Angeles	Los Angeles	9,593	8,133	374,465	1,175	0.714	39.24%	7.599	4338
707321	SBSTCA11	Sebastapol	Sonoma	2,794	32,610	351,030	2,091	1,270	39.29%	8.993	4995
530522	WNTRCA11	Winters	Yolo	734	16,119	63,060	2,438	1,465	39.91%	10.472	5081
760792	SNMCCA11	San Marcos	San Diego	4,889	1,511	419,648	0,852	0.510	40.14%	7.990	4290
408138	SNVACA01	Carrol Sunnyvale	Santa Clara	7,759	6,195	147,584	0,900	0.538	40.24%	6.985	3934
510001	ALBYCA11	Albany Solano	Alameda	6,236	21,550	92,458	1,195	0.710	40.63%	6.600	3776
408132	SNUSCA14	San Jose Foxworthy	Santa Clara	9,411	151,565	564,078	1,063	0.626	41.08%	6.903	4123
707304	LWLKCA11	Lower Lake	Lake	1,965	27,689	308,029	2,384	1,404	41.11%	12.270	5874
805385	PSRBCA01	Paso Robles	San Luis Obispo	4,945	6,585	551,732	1,331	0.783	41.15%	3.994	2574
760758	OCSDCA11	Oceanside Mission	San Diego	4,352	14,021	330,986	0,964	0.567	41.18%	6.384	4415
760730	ELNCA01	El Centro	Imperial	3,848	2,151	156,017	1,028	0.602	41.39%	6.009	3269
831141	WTVLCA01	Watsonville	Santa Cruz	7,582	48,755	199,766	1,182	0.684	42.08%	6.329	3535
323626	LSANCA05	LSAN Pleasant	Los Angeles	6,868	5,382	232,270	2,193	1,239	43.52%	5.636	3261
661402	WASCCA01	Wasco	Kern	774	20,085	66,272	2,268	1,270	44.00%	3.640	2568
661367	DELNCA11	Delano	Tulare	1,939	48,637	230,364	1,467	0.817	44.27%	3.683	2513
951774	RVSDDCA01	Riverside Orange	Riverside	7,926	8,685	477,823	1,168	0.645	45.24%	5.807	3301
805391	SATCCA12	Saticoy	Ventura	1,946	5,363	121,595	0,997	0.546	45.47%	4.686	3541
707328	UKHCA01	Ukiah Main	Mendocino	3,947	17,349	316,473	1,342	0.734	45.28%	9.117	5362
831100	APTSACA12	Aptos	Santa Cruz	2,864	6,466	76,438	1,146	0.619	45.97%	7.163	3855
559168	FRSNCA01	Fresno Main	Fresno	7,618	8,285	783,227	2,085	1.126	45.97%	4.673	2711
408129	SNUSCA11	San Jose White Rd	Santa Clara	8,051	21,239	312,421	1,345	0.726	46.00%	4.523	2789
951721	CORNCA11	Corona	Riverside	10,738	12,733	1,015,536	0,974	0.526	46.02%	4.398	2806
323635	LSANCA14	LSAN Adams	Los Angeles	3,816	17,409	218,231	1,913	1.024	46.48%	5.536	3568
415060	SNFFCA05	SF Mission 25th St	San Francisco	10,082	10,859	247,554	0,700	0.373	46.65%	4.991	2800
916536	FLSMCA14	Folsom Blue Ravine	Sacramento	1,768	39,374	49,751	1,022	0.545	46.66%	5.107	3141
949731	ELTRCA11	El Toro	Orange	10,967	14,400	161,360	0,993	0.530	46.67%	4.771	2940
310664	WLMGCA01	Wilmington	Los Angeles	5,429	7,678	370,114	1,356	0.713	47.45%	5.053	3122
415059	SNFFCA04	SF Market McCoppin	San Francisco	10,962	5,814	499,757	0,647	0.340	47.56%	4.710	2907
916499	SCRMCA03	SCRM Garden	Sacramento	8,642	31,091	487,675	1,453	0.761	47.66%	5.697	3387
661384	PLDLCA01	Palmdale	Los Angeles	4,380	17,422	371,660	0,808	0.423	47.74%	4.333	2976
530494	RDBLCA01	Red Bluff	Tehama	3,745	123,883	121,506	1,707	0.892	47.74%	6.282	3481
831105	CRMLCA11	Carmel Main	Monterey	4,592	4,577	406,060	1,106	0.578	47.77%	4.730	2775
415061	CRMLCA11	SF Juniper Onondaga	San Francisco	11,364	67,367	293,567	1,106	0.578	47.77%	4.730	2775
805399	WNTRCA11	Ventura Main Montalvo	Ventura	4,798	6,318	295,151	0,892	0.465	47.81%	7.955	4533
916482	ORVACA11	Orangevale	Sacramento	2,287	39,700	90,970	1,435	0.735	48.81%	5.487	3976
510002	ALMDCA11	Alameda Central	Alameda	6,355	5,120	185,433	0,814	0.416	48.88%	5.149	2815
818662	WNNYCA02	Van Nuys	Los Angeles	10,196	15,266	529,734	1,103	0.563	48.94%	5.352	2868
209236	WLLCCA11	Wallace	Calaveras	400	23,151	44,903	2,241	1.141	49.07%	5.581	3574
559245	FRSNCA14	Fresno West Highway City	Fresno	3,283	80,144	335,224	1,700	0.865	49.12%	5.156	2764
916498	SCRMCA02	SCRM Ivanhoe	Sacramento	7,391	11,948	250,936	1,285	0.663	49.20%	6.005	3092
530469	LSMLCA11	Los Molinos	Tehama	355	21,947	46,593	2,206	1.115	49.47%	6.771	4038
831126	SNZCA11	Santa Cruz Capitola	Santa Cruz	4,979	32,778	126,850	1,037	0.521	49.72%	6.255	3186
707307	MKVLCA11	McKinleyville	Humboldt	1,103	9,736	46,892	0,710	0.357	49.74%	4.082	2480

Table 7.14 2018-2019 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" WIRE CENTERS (continued)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct. Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratin (mins)
818610	CNPKCA01	Canoga Park	Los Angeles	13,344	16,043	1,356,631	1.298	0.652	49.80%	4.005	2417
707290	FRFDCA01	Fairfield	Solano	5,082	32,398	345,379	1.076	0.532	50.56%	6.728	4089
916502	SCRMCA13	SCRM Fruitridge	Sacramento	2,983	62,711	127,645	1.268	0.625	50.71%	5.569	3405
714789	SNANCA11	Bristol	Orange	9,617	73,863	264,596	0.959	0.469	51.06%	5.261	2948
650006	BRLNCA01	Burlingame	San Mateo	7,936	72,737	106,149	0.805	0.394	51.13%	4.366	2530
818652	RESDCA01	Reseda	Los Angeles	10,038	19,900	602,866	1.295	0.631	51.23%	4.016	2306
916451	FROKCA11	Fair Oaks	Sacramento	7,463	56,582	362,215	1.057	0.506	52.09%	5.166	2829
916478	NHLDCA11	Edgewood N Highl	Sacramento	4,053	31,539	368,641	1.418	0.673	52.51%	5.064	3054
916479	NSCRCA11	Wabash	Sacramento	7,088	95,277	412,604	1.031	0.485	52.97%	5.407	2948
818648	NORCA11	Northridge	Los Angeles	10,424	37,683	986,797	1.143	0.537	53.04%	3.974	3626
310609	CMTNCA01	Compton	Los Angeles	9,969	51,395	1,171,795	1.777	0.835	53.04%	4.165	3058
559159	CLVSCA11	Clovis	Fresno	8,311	19,168	881,838	1.562	0.728	53.42%	3.901	2445
559194	MADRCOA11	Madera Main	Madera	3,987	21,845	685,245	1.886	0.853	54.76%	4.001	2458
916453	FLSMCA12	Folsom Nimbus	Sacramento	1,844	26,554	114,499	0.471	0.191	59.43%	4.804	2560
925079	WNCKCA11	Walnut Creek	Contra Costa	11,153	22,950	506,532	0.831	0.333	59.92%	4.318	2161
951765	PDLYCA11	Pedley	Riverside	2,466	27,450	435,505	1.187	0.460	61.29%	3.190	1861
650010	COLACA01	Colma Daly City	San Mateo	5,878	39,715	159,553	0.997	0.372	62.68%	2.861	1989
714804	SNANCA12	Santa Ana West SNAN Bolsa	Orange	2,806	16,598	74,071					

It is useful to put these expenditures in context. Table 7.15 below summarizes three categories of AT&T California expenditures during the 2018-2019 period.

Table 7.15		
AT&T CALIFORNIA COMPARISON AMONG PLANT INVESTMENT CATEGORIES 2018-2019		
Expenditure category	2018-2019 Amount	Percent of Total Gross Plant Additions
Total Gross Plant Additions (per Form 43-02)	2,310,891,000	100.000%
Rehabilitation expenditures (per AT&T-CA Response to DR 11-A-17/18)	107,211,728	4.553%
GO 133-D §9.7 "Alternative Investments" in lieu of fines	2,725,499	0.118%

As is apparent, the amounts that AT&T California has committed to spend on GO 133-D §9.7 "Alternative Investments" in lieu of paying fines represents a *de minimis* fraction of the Company's total gross infrastructure investments – slightly over one-tenth of one percent. Of perhaps greater importance, the minuscule extent of such "alternative" investment outlays when compared with even the identified plant rehabilitation costs begs the question as to whether these expenditures would have been made anyway, irrespective of the GO 133-D §9.7 opportunity to make investments in legacy service infrastructure *that would ostensibly not have been made in the absence of the GO 133-D §9.7 offer*.

Table 7.16 provides a summary of AT&T California "rehabilitation" expenditures for all of its wire centers over the 2018-2019 period as provided in response to DRs 11-A-17/18. Over this two-year period, AT&T California expended some \$107.2-million across four categories of plant rehabilitation – AT&T Field Operations (AFO) maintenance projects (\$28.0-million), Construction & Engineering (C&E) capital projects (\$2.0-million), Outside Plant (OSP) rehabilitation (\$20.4-million), and other Plant rehabilitation (\$56.7-million).

Inasmuch as AT&T California has consistently and persistently failed to meet the minimum GO 133-C/D service quality standards, it is not entirely clear how the specific wire centers for

which the Company has elected to make an investment in lieu of a fine were selected. Table 7.17 below compares the amounts expended specifically on GO 133-D §9.7 “alternative investments” with the corresponding amounts expended for each wire centers on the 2018-2019 “rehabilitation” projects. Table 7.18 presents the same data as in Table 7.17, sorted by total rehabilitation expenditures for each wire center, from largest to smallest. several key service quality performance metrics for each AT&T wire center. Finally, Table 7.19 provides the same rehabilitation expenditures by wire center as in Table 7.14, but includes all AT&T California wire centers, not just those for which GO 133-D §9.7 “Alternative Investments” had been committed.

Table 7.16
AT&T CALIFORNIA
REHABILITATION EXPENDITURES BY WIRE CENTER
2018-2019

WC	CLI	WC Name	County	Jan 2018 Access Lines	Type of Expenditure			Total	\$ per AL	
					TFS	C&E	OSP Rehab			
661410	ACTNCA11	Action	Los Angeles	743	35,978	-	5,421	81,442	122,841	165.33
661351	AGDLCA11	Agua Dulce	Los Angeles	456	17,635	-	184,297	109,238	311,170	682.39
818600	AGORCA11	Agoura	Los Angeles	4858	82,369	-	128,299	740,559	951,226	195.81
510001	ALBYCA11	Albany Solano	Alameda	6236	4,033	21,550	6,135	60,739	92,458	14.83
530425	ALGHCA11	Alleganey	Sierra	47	-	-	-	15,482	15,482	329.40
626601	ALHBCA01	Alhambra	Los Angeles	8889	108,120	-	8,087	116,599	232,806	26.19
510002	ALMDCA11	Alameda Central	Alameda	6355	49,533	-	55,779	80,121	185,433	29.18
619700	ALPICA12	Alpine	San Diego	1624	7,951	55,324	14,160	41,412	118,847	73.18
209150	ANCMCA01	Angels Camp	Calaveras	809	6,757	-	3,703	90,068	100,528	124.26
707275	ANGWCA11	Angwin	Napa	591	-	-	1,455	34,586	36,041	60.98
714701	ANHMCA01	Anaheim Lemon	Orange	7849	204,314	-	30,655	86,798	321,767	40.99
714702	ANHMCA11	Anaheim Cypress	Orange	7886	266,700	-	131,634	321,131	719,465	93.61
714703	ANHMCA12	Anaheim La Palma	Orange	1791	56,048	3,405	106,754	27,871	194,078	108.36
714811	ANHMCA17	ANHM Hills	Orange	848	37,705	-	1,413	13,002	52,121	61.46
707322	ANNPCA11	Annapolis	Sonoma	71	-	-	-	12,067	12,067	169.95
925003	ANTCCA11	Antioch	Contra Costa	5049	122,434	-	145,321	115,285	383,040	75.86
831100	APTSCA12	Aptos	Santa Cruz	2864	29,435	-	-	47,002	76,438	26.69
626602	ARCDDCA11	Arcadia	Los Angeles	4800	75,644	-	-	93,126	168,770	35.16
707276	ARCTCA11	Arcata	Humboldt	1835	9,015	-	5,732	74,706	89,453	48.75
805352	ARGRCA12	Arroyo Grande	San Luis Obispo	3827	128,197	-	-	261,396	389,592	101.80
831144	ARMSCA11	Aromas	San Benito	446	16,428	-	-	36,467	52,895	118.60
209151	ARNLCA11	Arnold	Calaveras	1936	29,593	-	18,263	149,738	197,594	102.06
530427	ARSNCA11	Anderson	Shasta	1747	-	-	3,921	75,213	79,134	45.30
951704	ARTNCA11	Arlington	Riverside	5896	198,128	-	9,651	289,311	477,090	80.92
661353	ARVNCA11	Arvin	Kern	736	75,020	-	-	71,014	146,034	198.42
559152	ASMTCA11	Asocio Ash Mtn	Fresno	82	-	-	-	-	-	-
805354	ATSCCA11	Atascadero	San Luis Obispo	2312	27,053	-	-	-	-	-
209153	ATWRCA12	Atwater	Merced	1837	51,329	-	-	-	-	-
530428	AUBNCA01	Auburn Main	Placer	5789	-	-	91,056	114,874	257,259	140.04
530429	AUBNCA11	Auburn Placer Hills	Placer	1530	-	-	12,378	160,220	172,598	29.81
805355	AVBHCA11	Avila Beach	San Luis Obispo	337	4,343	-	-	36,902	56,761	37.10
559154	AVNLCA12	Avenal	Kings	434	4,583	-	-	14,723	19,066	56.58
760705	BAKRCA11	Baker	San Bernardino	114	-	-	-	48,098	52,681	121.38
949706	BALBCA01	Balboa	Orange	2703	4,477	-	-	1,308	1,308	11.47
530434	BCWYCA11	Brockway	Placer	924	-	-	1,371	46,964	51,441	19.03
707279	BBBACA11	Bodega Bay	Sonoma	336	19,664	-	4,960	22,600	23,972	25.94
530431	BEALCA11	Beale	Yuba	78	1,536	-	-	58,721	83,346	248.05
323604	BELLC11	Bell	Los Angeles	2449	62,494	-	78,872	73,545	214,911	87.75
530432	BGGSCA11	Biggs	Butte	249	3,505	-	-	29,858	33,362	133.99
831101	BGSRCA11	Big Sur	Monterey	389	23,979	-	-	98,218	122,197	314.13
707281	BGVLCA11	Bridgeville	Humboldt	173	19,288	-	-	25,146	89,077	514.90
661356	BKFDCA11	Bakersfield Empire	Kern	1142	60,507	-	252,344	188,365	501,216	438.89
661357	BKFDCA12	Bakersfield Main Fairview	Kern	170,104	170,104	-	667,765	500,372	1,338,241	217.32
661358	BKFDCA13	Bakersfield Columbus	Kern	2365	87,306	-	-	310,175	439,850	185.98
661359	BKFDCA14	Bakersfield Temple	Kern	6893	271,094	-	207,458	1,199,929	1,678,481	250.78

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2018 Access Lines	TFS	Type of Expenditure C&E	OSP Rehab	Plant Rehab	Total	\$ per AL
661360	BKFDCA15	Bakersfield Mettler	Kern	299	9,870	-	1,854	76,484	88,208	295.01
661361	BKFDCA17	Bakersfield West Rosedale	Kern	3311	80,587	-	290	226,962	307,839	92.97
661409	BKFDCA19	Bakersfield Nomad	Kern	1972	9,529	-	3,882	109,681	123,092	62.42
510004	BKLYCA01	Berkeley Bancroft	Alameda	8600	50,040	-	-	48,818	98,859	11.50
831102	BLCKCA11	Boulder Creek	Santa Cruz	1051	27,044	51,244	4,970	23,250	106,508	101.34
707278	BLKCA11	Blue Lake	Humboldt	236	-	-	27,824	30,195	58,019	245.84
530433	BLRSCA12	Blairsden	Plumas	901	15,561	-	-	33,503	49,064	54.45
707277	BNCJCA11	Benicia	Solano	1943	24,770	-	-	160,261	185,031	95.23
530430	BNGRCA11	Bangor	Butte	335	23,710	-	3,876	9,844	13,720	40.95
831103	BNLMCA11	Ben Lomond	Santa Cruz	579	23,210	-	-	10,255	33,465	57.80
714710	BNPKCA11	Buena Park	Orange	4388	104,082	-	19,839	216,700	340,621	77.63
707280	BNVLC A11	Boonville	Mendocino	645	32,398	23,288	10,735	54,879	121,299	188.06
818605	BRBNCA11	Burbank Palm	Los Angeles	9668	271,161	-	39,446	361,190	671,797	68.08
818606	BRBNCA13	Burbank Thornton	Los Angeles	755	-	-	1,596	4,497	6,093	8.07
805363	BRDLCA90	Bradley	Monterey	495	-	-	-	42,059	42,059	84.97
714709	BREA CA12	Brea	Orange	2998	200,691	-	-	103,268	326,264	108.83
650006	BRLNCA01	Burlingame	San Mateo	7936	66,164	-	22,308	22,296	106,149	13.38
760707	BRSPCA11	Borrego Springs	San Diego	698	10,172	-	3,212	19,565	32,948	47.20
925007	BRWDCA12	Brentwood	Contra Costa	3696	81,491	-	24,717	23,749	129,956	35.16
760708	BRWLCA11	Brawley	Imperial	1759	48,929	-	21,626	37,954	108,509	61.69
925082	ESRNCA70	Bishop Ranch	Contra Costa	1443	-	-	-	20,613	20,613	14.28
530435	BTCYCA11	Butte City	Glenn	109	-	-	-	423	423	3.88
925008	BTISCA11	Bethel Island	Contra Costa	265	12,280	-	-	9,635	21,915	82.70
559242	BURLCA11	Burrell	Fresno	88	10,071	-	-	30,064	40,135	456.08
310607	BVHLC A01	Beverly Hills	Los Angeles	16372	226,627	-	18,338	75,384	320,349	19.57
209155	BVLYCA11	Bear Valley	Calaveras	436	-	-	-	40,343	40,343	92.53
661403	BVSPCA11	Bear Vily Spring	Kern	334	15,075	-	-	59,918	74,992	224.53
805362	BYPKCA11	Baywood Park	San Luis Obispo	920	19,818	-	1,768	129,976	151,562	164.74
619715	CAMPCA11	Campo	San Diego	474	3,384	-	24,660	28,238	56,282	118.74
707285	CBMTCA11	Cobb Mountain	Lake	317	3,426	-	20,158	53,551	77,134	243.33
530438	CHICCA01	Chico Main	Butte	10221	45,720	6,955	-	217,345	287,579	28.14
530437	CHLNCA11	Challange	Yuba	1149	-	-	10,669	12,013	22,682	19.74
831104	CHLRCA11	Chualar	Monterey	136	10,550	-	906	17,393	28,848	212.12
619718	CHVSCA11	Chula Vista Third Avenue	San Diego	3894	29,568	8,957	90,033	36,775	165,333	42.46
619719	CHVSCA12	Chula Vista Apache	San Diego	2258	6,792	-	21,654	15,566	44,012	19.49
559158	CHWCCA11	Chowchilla	Madera	963	60,158	-	37,633	68,398	166,189	172.57
818666	CLBSCA11	Calabasas Park Sorrento	Los Angeles	3840	34,810	-	11,917	254,065	300,793	78.33
818665	CLBSCA50	Calabasas Los Virgenes	Los Angeles	1058	13,009	-	-	10,274	23,283	22.01
310608	CLCYCA11	Culver City	Los Angeles	7964	271,881	-	-	3,347	277,935	34.90
559160	CLNGCA01	Coalinga	Fresno	817	-	-	2,707	121,754	128,060	156.74
707283	CLOKCA11	Clear Lake Oaks	Lake	536	-	-	6,307	16,408	22,715	35.86
760713	CLPTCA11	Calpatnia	Imperial	259	9,587	-	2,813	19,221	28,477	109.95
707282	CLSTCA11	Calistoga	Napa	1111	-	-	109,903	36,881	146,784	132.12
559159	CLVSCA11	Clovis	Fresno	8311	108,269	-	285,090	488,479	881,838	106.10
760712	CLXCCA12	Calxico	Imperial	1886	21,757	-	-	18,269	40,026	21.22
805364	CMBACA11	Cambria	San Luis Obispo	1435	39,488	-	15,350	116,114	170,952	119.13
559156	CMNLCA11	Camp Nelson	Tulare	680	-	-	-	11,900	11,900	17.50
760714	CMPDCA01	Camp Pendleton	San Diego	107	-	-	-	5,250	5,250	49.07
530436	CMPVCA11	Camptonville	Yuba	216	5,862	-	1,083	12,704	19,650	90.97
310609	CMTNCA01	Compton	Los Angeles	9969	425,745	51,395	117,343	577,312	1,171,795	117.54
925009	CNCRCA01	Concord	Contra Costa	8980	82,868	-	105,552	144,030	332,450	37.02
818610	CNPKCA01	Canoga Park	Los Angeles	13344	382,691	11,710	108,997	853,234	1,356,631	101.67

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2018 Access Lines	TFS	Type of Expenditure C&E	OSP Rehab	Plant Rehab	Total	\$ per AL
530528	CNVYCA11	Central Valley	Shasta	1528	-	-	6,836	40,791	47,627	31.17
707284	CODLCA11	Cloverdale	Sonoma	832	33,571	-	1,973	95,418	130,963	157.41
650010	COLACA01	Colima Daly City	San Mateo	5878	59,027	39,715	18,707	42,104	159,553	27.14
707286	CORDCA12	Cordelia	Solano	1340	13,018	-	-	38,359	51,378	38.34
951721	CORNCA11	Corona	Riverside	10738	466,331	3,991	44,705	500,509	1,015,536	94.57
909720	COTNCA11	Colton	San Bernardino	3205	19,986	-	32,279	252,466	304,731	95.08
510011	CRCOCA02	Crockett	Contra Costa	289	-	-	-	1,666	1,666	5.76
949722	CRDMCA11	Corona Del Mar	Orange	6350	95,675	-	385	36,820	132,880	20.93
760716	ORLSCA11	Carlsbad Harding	San Diego	2206	19,279	-	-	78,729	98,008	44.43
760717	CRLSCA12	Carlsbad La Costa	San Diego	3662	4,202	-	8,091	62,771	17,114	17.14
831105	CRMLCA11	Carmel Main	Monterey	4592	6,650	-	12,620	386,790	406,060	88.43
619723	CRNDCA11	Coronado	San Diego	1724	-	10,589	-	3,250	13,839	8.03
530440	CRNGCA12	Corning	Tehama	1179	10,530	-	-	89,716	76,099	76.09
559157	CRTHCA11	Caruthers	Fresno	383	-	-	-	29,715	29,715	77.59
831106	CRVYCA11	Carmel Valley	Monterey	1039	14,390	-	4,718	42,364	61,473	59.17
949725	CSMSCA11	Costa Mesa	Orange	5737	99,849	-	-	178,369	31,099	31.09
661408	CSTCCA11	Castaic	Los Angeles	3431	60,539	-	-	140,554	201,094	58.61
831107	CSVLC A11	Castroville	Monterey	1012	15,190	-	2,332	7,324	24,845	24.55
209161	CTVLCA11	Colati	Sonoma	1983	9,439	11,393	10,692	39,692	71,216	35.91
530441	CTWDC A11	Coltonwood	Mariposa	663	13,400	-	16,996	45,009	75,405	113.73
209162	CWLDC A12	Crows Landing	Tehama	2138	-	11,263	-	105,583	116,846	54.65
805366	CWYSCA11	Cayucos	Stanislaus	91	-	-	1,144	8,669	9,812	8.66
925081	CYTNCA11	Clayton	San Luis Obispo	526	28,876	-	-	39,759	130,448	130.48
760726	CYWLCA11	Coyote Wells	Contra Costa	1502	15,582	-	40,714	14,937	71,233	47.43
925085	DAVLCA13	Danville Main 12	Imperial	46	-	-	-	1,680	1,680	36.52
530442	DAVSCA11	Davis	Contra Costa	5110	89,386	-	37,979	175,867	303,232	59.34
661367	DELNCA11	Delano	Contra Costa	2391	3,731	-	-	49,300	53,030	22.18
559164	DINBCA01	Dinuba	Yolo	4191	36,334	48,637	30,368	113,384	143,752	34.30
707443	DIXNCA11	Dixon	Tulare	1352	13,437	-	17,284	128,109	230,364	118.81
858727	DLMRCA12	Del Mar	Tulare	1345	13,437	-	2,552	62,101	78,090	57.76
559163	DLRYCA11	Del Rey	Solano	5494	6,310	-	5,147	77,354	110,688	82.30
619728	DLZRC A11	Duizura	San Diego	143	3,070	-	-	18,635	21,705	151.78
530445	DNGNCA12	Dunnigan	San Diego	504	17,457	-	5,693	5,228	28,378	56.31
530446	DNSMCA11	Dunsmuir	Yolo	113	-	-	3,516	15,002	18,518	163.88
530447	DTFLCA11	Alta Dutch Flats	Siskiyou	413	-	-	2,052	19,473	19,473	47.15
626611	DWNVCA11	Downieville	Placer	538	-	-	-	8,963	43,835	81.48
661369	EDWRC A01	Edwards	Sierra	239	-	-	-	6,702	6,702	37.50
530448	EKCKCA11	Elk Creek	Kern	137	-	-	-	1,029	6,702	48.92
619729	ELCJCA11	El Cajon	Glenn	100	13,889	-	-	171,208	149,17	149.17
760730	ELCNCA01	El Centro	San Diego	4004	46,348	-	109,087	326,642	326,642	81.58
707288	ELK CA11	Elk	Imperial	3848	96,540	1	-	59,476	156,017	40.54
626611	ELMNCA01	El Monte	Mendocino	211	-	-	8,477	-	8,477	40.18
510013	ELSBCA11	Rich Applan Way El Sobrante	Los Angeles	9210	70,679	-	36,717	152,686	260,083	28.24
310613	ELSGCA12	El Segundo Douglas	Contra Costa	3219	49,782	-	17,904	83,178	150,753	46.83
949731	ELTRCA11	El Toro	Los Angeles	4029	8,024	-	17,904	16,819	42,748	10.61
760732	ENCTCA12	Encinitas	Orange	10967	90,746	-	1,557	69,057	161,360	14.71
661368	ERLMCA11	Earlhart	San Diego	4571	46,941	-	3,362	184,247	234,551	51.31
209192	ESCLCA11	Escalon	Tulare	332	2,385	-	-	47,475	49,860	150.18
760733	ESCNCA01	Escondido	San Joaquin	929	6,012	-	5,397	32,958	32,958	35.48
530450	ESPRCA11	Esparto	San Diego	7483	110,814	-	107,162	770,335	988,311	132.07
			Yolo	266	5,705	-	2,459	21,211	29,375	110.43

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLI	WC Name	County	Access Lines	Jan 2018	TFS	Type of Expenditure	OSP Rehab	Plant Rehab	Total	\$ per AL
							C&E				
707289	EURKCA01	Eureka	Humboldt	4799	30,922	-	-	9,036	87,620	127,638	26.60
831108	FETNCA11	Felton	Santa Cruz	976	2,883	-	-	-	23,370	26,254	26.90
760735	FLBKCA12	Failbrook	San Diego	3475	95,771	-	-	-	148,057	356,664	102.64
805370	FLMRCA11	Fillmore	Ventura	791	-	-	-	112,835	148,057	356,664	102.64
916453	FLSMCA12	Folsom Nimbus	Sacramento	1844	12,285	-	26,659	37,632	31,252	58,884	74.44
916454	FLSMCA13	Folsom El Dorado Hills	Sacramento	2631	37,222	-	-	36,474	39,081	114,499	62.09
916536	FLSMCA14	Folsom Blue Ravine	Sacramento	1768	4,433	-	-	84,425	50,431	172,078	65.40
909736	FNTACA11	Fontana	San Bernardino	5840	404,038	-	27,850	32,050	365,655	829,593	142.05
559166	FRBHCA11	Firebaugh	Fresno	604	36,398	-	-	3,099	23,750	63,246	104.71
760738	FRCKCA11	Furnace Creek	San Bernardino	140	-	-	-	2,282	3,577	5,860	41.86
707290	FRFDCA01	Fairfield	Solano	5082	17,557	-	56,398	49,994	221,491	345,379	67.96
530455	FRGLCA11	French Gulch	Shasta	82	-	-	-	-	21,966	21,966	267.88
510014	FRMTCA11	Fremont Main 11	Alameda	7958	15,737	-	12,583	248,269	184,798	461,388	57.98
510015	FRMTCA12	Fremont Adams Oliver 12	Alameda	6839	24,313	-	-	95,247	140,554	260,114	38.03
916451	FROKCA11	Fair Oaks	Sacramento	7463	130,424	-	21,718	76,531	133,542	362,215	48.53
559168	FRSNCA01	Fresno Main	Fresno	7618	197,259	-	8,285	246,620	331,062	783,227	102.81
559169	FRSNCA11	Fresno Baldwin	Fresno	5377	46,725	-	-	106,245	122,918	275,888	51.31
559172	FRSNCA12	Fresno Clinton	Fresno	4088	75,275	-	-	-	198,546	273,821	66.98
559170	FRSNCA13	Fresno Sierra	Fresno	106,973	-	-	-	96,335	438,293	641,601	100.44
559245	FRSNCA14	Fresno West Highway City	Fresno	3283	111,024	-	-	20,321	203,880	335,224	102.11
559247	FRSNCA15	Fresno Woodward	Fresno	1076	5,853	-	-	5,414	58,148	69,414	64.51
559165	FRVLC A11	Farmersville	Tulare	401	-	-	-	-	27,801	27,801	69.33
707291	FSVLCA11	Foresville	Sonoma	737	9,625	-	-	13,701	123,914	147,241	199.78
707292	FTBRCA02	Fort Bragg	Mendocino	3227	118,761	-	49,006	34,558	369,634	571,959	177.24
707293	FTUNCA11	Fortuna	Humboldt	1102	-	-	-	6,046	32,103	38,148	34.62
714737	FUTNCA01	Fullerton	Orange	8005	206,146	-	-	31,664	321,509	559,318	69.87
559167	FVPNCA11	Five Points	Fresno	151	-	-	-	-	22,427	22,427	148.52
661371	FZPKCA11	Frazier Park	Kern	157	53,678	-	-	59,706	142,045	255,429	337.42
209171	GALTC A11	Galt	Sacramento	1448	62,807	-	-	6,637	32,637	95,444	65.91
818614	GDLCA11	Glendale	Los Angeles	14860	249,437	-	-	69,679	325,539	644,655	43.97
831109	GNFDCA11	Green Field	Monterey	940	73,925	-	-	-	111,127	185,052	196.86
831110	GNZLCA11	Gonzales	Monterey	542	7,700	-	-	-	68,897	127,12	127.12
530458	GRBRCA11	Gerber	Tehama	182	6,484	-	-	-	14,442	20,926	114.98
530461	GRDLCA11	Gridley	Butte	797	-	-	-	3,453	40,290	43,743	54.88
310615	GRDNCA01	Gardena	Los Angeles	11967	446,303	-	-	646,696	200,391	1,293,390	108.08
714739	GRGVCA01	Euclid	Orange	6721	43,631	-	-	1,143	21,752	66,526	9.90
530460	GRNDCA13	Grenada	Siskiyou	81	-	-	-	-	3,010	3,010	37.16
530457	GRTWCA11	Georgetown	El Dorado	1339	33,075	-	40,908	1,816	24,612	100,410	74.99
530459	GRVYCA01	Grass Valley	Nevada	7879	36,311	-	62,162	7,297	179,196	284,966	36.17
530532	GRVYCA11	Lake of the Pine	Nevada	1863	6,015	-	32,422	-	25,960	25,960	13.93
530535	GRVYCA12	Wildwood	Nevada	1442	-	-	-	12,170	25,990	76,597	53.12
559246	GSHNCA11	Goshen	Tulare	730	-	-	-	2,000	24,114	26,113	35.77
707295	GULLCA11	Guatula	Mendocino	1066	10,075	-	-	6,587	80,008	96,671	90.69
209174	GUSTCA11	Gustine	Merced	604	10,111	-	-	1,272	47,790	97,97	97.97
707296	GUVLCA11	Guemville	Sonoma	691	-	-	-	6,554	83,385	89,939	130.16
209173	GVLDA11	Groveland	Tuolumne	1863	49,555	-	-	49,943	106,270	205,768	110.45
707294	GYVLC A11	Geyersville	Sonoma	295	3,816	-	-	-	28,730	32,547	110.33
530456	GZLLCA11	Gazelle	Siskiyou	44	-	-	-	-	-	-	-
209176	HERLCA11	Herald	Sacramento	273	33,126	-	-	16,208	13,443	62,776	229.95
909741	HGLDCA11	Highland	San Bernardino	2208	127,505	-	-	24,068	109,223	260,788	118.11
209177	HGSNCA11	Hughson	Stanislaus	531	22,328	-	-	202	26,926	49,456	93.14
707297	HLBGCA11	Healdsburg	Sonoma	2672	14,882	-	-	10,631	136,995	162,508	60.82

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2018 Access Lines	TFS	Type of Expenditure C&E	OSP Rehab	Plant Rehab	Total	\$ per AL
707301	LKBRC A11	Lake Berryessa	Napa	188	-	-	5,348	6,539	11,886	63.23
661405	LKLA A11	Lake Los Angeles	Los Angeles	427	3,202	-	-	40,478	43,680	102.29
707302	LKPTCA A11	Lakeport	Lake	2039	-	-	64,355	126,132	190,486	93.42
619751	LKSDCA A12	Lakeside	San Diego	1795	61,228	-	-	42,539	172,614	68.84
530471	LLTNCA A11	Loyalton	Plumas	546	-	-	5,096	10,076	15,172	27.79
916467	LNCLCA A11	Lincoln	Placer	840	-	-	9,667	76,217	85,884	102.24
661374	LNVC A11	Leona Valley	Los Angeles	322	4,327	-	84,819	66,925	156,071	484.69
209191	LODICA A01	Lodi	San Joaquin	5596	112,764	-	5,512	147,422	265,687	47.48
707303	LOLTCA A11	Lolita	Humboldt	123	1,845	-	-	7,511	9,355	76.06
916470	LOMSCA A11	Loomis	Placer	1397	37,127	-	-	78,264	115,392	82.60
310622	LOMTC A11	Lomita	Los Angeles	5732	125,126	-	9,155	42,731	177,012	30.88
415023	LRKSC A11	Larkspur Corte Madera	Marin	3120	6,454	-	-	22,168	28,622	9.17
213624	LSANCA A02	Madison 02 MO	Los Angeles	7967	131,401	-	74,057	86,056	291,514	36.59
213625	LSANCA A03	Madison 03 MA	Los Angeles	5572	31,531	-	-	43,968	75,499	13.55
323626	LSANCA A05	LSAN Pleasant	Los Angeles	6868	219,327	-	-	12,943	232,270	33.82
213627	LSANCA A06	Union	Los Angeles	4504	48,031	-	76,028	57,957	182,016	40.41
310628	LSANCA A07	LSAN Airport	Los Angeles	7220	3,608	-	10,045	5,468	19,121	2.65
323629	LSANCA A08	LSAN Melrose	Los Angeles	11621	226,577	-	82,052	57,278	365,907	31.49
213630	LSANCA A09	Richmond	Los Angeles	6015	199,387	-	76,822	58,822	335,031	55.70
323631	LSANCA A10	LSAN Webster	Los Angeles	9845	111,548	-	117,800	53,685	283,033	28.75
213632	LSANCA A11	Rampart	Los Angeles	10841	139,296	-	184,230	89,753	413,279	38.12
323633	LSANCA A12	Normandy	Los Angeles	9451	369,899	-	166,210	109,302	645,411	68.29
323634	LSANCA A13	LSAN Plymouth	Los Angeles	5803	196,594	-	50,900	34,519	282,014	48.60
323635	LSANCA A14	LSAN Adams	Los Angeles	3816	162,423	-	49,089	6,720	218,231	57.19
323636	LSANCA A15	LSAN Axminster	Los Angeles	7990	297,859	-	23,042	16,719	337,619	42.26
323638	LSANCA A23	LSAN Capitol	Los Angeles	7035	37,736	-	71,313	98,292	207,342	29.47
323640	LSANCA A29	LSAN Sunset	Los Angeles	5382	128,442	-	29,453	33,230	191,126	35.51
323641	LSANCA A34	LSAN Angeles	Los Angeles	9593	43,464	-	128,897	202,105	374,465	39.04
323642	LSANCA A35	LSAN Montebello	Los Angeles	7620	62,104	-	17,752	182,008	261,864	34.37
323643	LSANCA A38	LSAN Republic	Los Angeles	6084	262,945	-	-	11,028	273,973	45.03
323644	LSANCA A56	LSAN Clinton	Los Angeles	6516	83,539	-	67,124	42,048	192,710	29.57
650024	LSATCA A11	Los Altos	Santa Clara	4386	69,173	45,785	70,552	50,561	236,071	53.82
209193	LSBNCA A12	Los Banos	Merced	2068	43,297	-	41,112	72,878	157,287	76.06
530469	LSMLCA A11	Los Molinos	Tehama	355	9,917	-	967	35,709	46,593	131.25
530466	LSTNCA A11	Lewiston	Trinity	508	-	-	-	14,930	14,930	29.39
661375	LTRKCA A11	Little Rock	Los Angeles	969	-	-	207,164	88,466	326,765	337.22
925025	LVMRCA A11	Livermore	Alameda	6279	31,136	-	10,773	320,705	489,137	77.90
530468	LVOKCA A11	Live Oak	Sutter	672	2,895	-	3,151	25,114	31,160	46.37
707304	LWLKCA A11	Lower Lake	Lake	1965	18,632	58,372	26,255	204,769	308,029	156.76
559194	MADRCA A11	Madera Main	Madera	3987	283,994	-	45,112	356,139	685,245	171.87
559243	MADRCA A12	Madera Bonnadelli	Madera	369	27,307	-	-	24,976	52,283	141.69
831113	MARNCA A11	Marina	Monterey	1358	-	-	-	21,687	21,687	15.97
209199	MDSTCA A02	Modesto Main	Stanislaus	11017	41,532	-	23,827	579,236	644,595	58.51
209200	MDSTCA A03	Modesto Kellogg South Ceres	Stanislaus	2635	13,244	-	7,704	175,530	196,478	74.56
209201	MDSTCA A04	Modesto Kingswood Curtis Salida	Stanislaus	1201	-	-	-	43,279	43,279	36.04
209248	MDSTCA A05	Modesto Tully	Stanislaus	634	-	-	-	17,275	17,275	27.25
209249	MDSTCA A52	Modesto Davis	Stanislaus	18	-	-	-	1,268	1,268	70.47
707306	MDTWCA A11	Middletown	Lake	874	-	-	56,398	115,765	172,164	196.98
209202	MKHLCA A12	Mokelumne Hill	Calaveras	183	-	-	8,902	5,969	14,871	81.26
707307	MKVKCA A11	McKinleyville	Humboldt	1103	3,811	-	-	39,213	46,892	42.51
650026	MLBRCA A11	Millbrae	San Mateo	2613	29,038	-	3,868	-	38,267	14.64
408114	MLPSCA A11	Milpitas	Santa Clara	5636	61,421	-	-	66,560	127,982	22.71

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2018		TFS	Type of Expenditure			Total	\$ per AL
				Access Lines	Country		C&E	OSP Rehab	Plant Rehab		
415027	MLVYCA01	Mill Valley	Marin	3821		16,450	-	27,286	20,057	63,792	16.70
707305	MNDCCA11	Mendocino	Mendocino	1560		15,718	-	2,926	136,389	155,033	99.38
559195	MNDTCA11	Mendocino	Fresno	448		40,539	-	-	36,390	76,929	171.72
650028	MNPKCA11	Monte Park	San Mateo	4016		97,799	-	5,808	71,422	175,028	43.58
707309	MNRICA11	Monte Rio	Sonoma	518		16,071	-	26,326	54,266	96,663	188.61
661376	MOJVCA01	Mojave	Kern	581		20,771	-	11,496	39,341	71,609	123.25
925029	MORGCA12	Moraga	Contra Costa	1735		6,985	-	15,825	74,237	42,779	86.98
805378	MRBACA11	Morro Bay	San Luis Obispo	993		18,491	-	-	67,881	86,371	106.21
209196	MRCDCA01	Merced	Merced	5298		151,287	-	183,508	227,923	562,718	54.20
530473	MRNDCA11	Meridan	Humboldt	150		-	-	-	5,420	36,13	130.20
707308	MRNDCA11	Miranda	Humboldt	286		-	-	-	37,236	37,236	94.09
209203	MRPHCA11	Murphys	Calaveras	818		20,534	-	4,526	51,903	76,963	495.94
805377	MRPKCA12	Moorpark	Ventura	2457		21,712	-	1,070,026	126,784	1,218,522	80.28
925030	MRTZCA11	Martinez	Contra Costa	3554		40,159	-	149,262	95,897	285,317	68.13
650031	MSBHCA11	Moss Beach	San Mateo	830		34,542	-	8,731	13,278	56,552	2.40
949806	MSVJCAAT	Mission Viejo	Orange	1889		2,081	-	2,452	-	4,533	8.569
530529	MTAGCA11	Montague	Siskiyou	534		-	-	-	8,569	8,569	16.05
760753	MTPSCA11	Mountain Pass	San Bernardino	19		-	-	-	6,590	6,590	30.02
831115	MTRYCA01	Monterey	Monterey	5760		-	-	9,345	163,584	172,928	39.449
530474	MTSHCA12	Mount Shasta	Siskiyou	1180		-	-	-	39,449	39,449	11.521
650032	MTVWCA11	Mountain View	Santa Clara	7929		26,428	-	30,686	54,407	111,521	14.06
530472	MVICA01	Marysville	Yuba	3543		4,549	12,529	86,041	229,635	444,116	58.28
707310	NAPACA01	Napa	Napa	7620		19,302	-	156,079	268,736	444,116	266.45
530477	NCLSCA12	Nicolas	Sutter	98		11,902	-	-	14,210	26,112	90.96
916478	NHLDCA11	Edgewood N Highl	Sacramento	4053		128,456	45,534	63,006	131,582	368,641	118.09
661379	NHLLCA01	Newhall	Los Angeles	5371		99,183	-	221,156	313,939	634,278	621.565
818646	NHWDCA01	NHWD Lanekershim	Los Angeles	6119		304,145	-	17,580	299,840	621,565	297.711
818647	NHWDCA02	NHWD Magnolia	Los Angeles	12872		329,591	-	160,963	297,711	788,265	88.610
707311	NICECA11	Nice	Lake	465		-	-	3,485	85,125	88,610	11.117
415033	NICSCA11	Nicasio	Marin	250		3,140	-	-	7,977	11,117	14.460
760855	NILDCA11	Niland Main	Imperial	83		6,527	-	-	7,933	14,460	171.57
760856	NILDCA12	Niland Bombay Beach	Imperial	98		4,213	-	6,399	6,202	16,814	88.11
805380	NIPMCA11	Nipomo	San Luis Obispo	999		39,895	-	-	48,125	88,020	986.797
818648	NORGCA11	Northridge	Los Angeles	10424		277,108	25,140	65,830	618,720	986,797	56.21
916479	NSRCRA11	Wabash	Sacramento	7088		49,114	107,480	62,149	193,861	412,604	35.62
916537	NSRCRA12	North Natomas	Sacramento	2047		5,710	-	21,700	45,513	72,922	20.740
530480	NSUNCA11	North San Juan	Nevada	490		3,447	-	-	17,293	20,740	51.37
619754	NTCYCA11	National City Highland	San Diego	1415		9,048	-	8,002	24,742	7,692	69.872
530475	NVCYCA11	Nevada City	Nevada	3415		17,209	29,760	13,500	114,954	175,423	75.62
916476	NWVSCA11	Newcastle	Placer	924		-	-	39,490	30,382	69,872	66.33
209204	NWMNCA12	Newman	Stanislaus	549		20,424	-	3,997	37,512	66,33	57.84
530481	NYUBCA11	North Yuba	Yuba	515		-	-	16,643	13,143	29,786	83.42
707312	OGDNCA11	Ocidental	Sonoma	599		7,622	-	4,456	37,892	49,970	76.05
760758	OCSDCA11	Oceanside Mission	San Diego	4352		52,404	1	4,465	226,116	330,986	187.65
805382	OJAICA11	Ojai	Ventura	1639		19,034	-	94,990	193,534	307,558	83.75
209205	OKDLCA11	Oakdale	Stanislaus	2070		83,756	-	10,639	78,973	173,368	11.91
510036	OKLDCA03	Oakland Franklin	Alameda	12884		47,126	-	18,361	87,899	153,386	47.445
510037	OKLDCA04	Oakland KelloggFruitvale	Alameda	5109		89,550	-	312,461	75,434	477,445	9.65
510038	OKLDCA11	Oakland 45th OlympicCentral	Alameda	9172		28,007	-	428	60,036	88,471	49.94
510039	OKLDCA12	Oakland Holly	Alameda	7805		107,138	-	156,548	126,106	389,792	55.130
510040	OKLDCA13	Oakland Mountain	Alameda	4550		4,964	-	6,712	43,454	55,130	12.12
925041	OKLYCA11	Oakley	Contra Costa	1105		21,509	-	-	5,148	26,657	24.12

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2018 Access Lines	TFS	Type of Expenditure C&E	OSP Rehab	Plant Rehab	Total	\$ per AL
805381	OKVWCA11	Oakview	Ventura	620	9,644	-	-	63,797	73,441	118.45
661383	OLDLCA11	Export Olddale	Kern	2977	128,265	-	570,062	320,891	1,019,218	342.36
559206	ORCVCA11	Orange Cove	Fresno	399	39,544	-	-	41,805	81,348	203.88
530483	ORLDCA11	Orland	Glenn	1400	25,593	-	33,053	91,937	33,292	66.67
925042	ORNDCA11	Orinda	Contra Costa	1932	15,738	-	-	11,941	27,680	14.33
714759	ORNGCA11	Orange Chapman	Orange	6854	125,168	-	6,911	309,173	441,253	64.38
714760	ORNGCA13	Orange Olive	Orange	5138	165,647	-	58,749	154,057	378,453	73.66
714761	ORNGCA14	Orange West	Orange	3181	34,971	-	-	57,785	92,757	29.16
559207	ORSICA11	Orosi	Tulare	757	26,495	-	16,748	91,538	134,780	178.05
916482	ORVACA11	Orangevale	Sacramento	2287	36,274	-	722	53,974	90,970	39.78
530484	ORVACA11	Oroville Main	Butte	3496	12,855	-	7,820	101,897	122,572	35.06
530485	ORVACA12	Oroville East	Butte	1522	60,267	40,316	5,761	33,167	139,512	91.66
619853	OTMSCA11	Otay Mesa	San Diego	986	9,747	-	7,780	26,841	27,22	27.22
760764	PALACA11	Pauma Valley	San Diego	812	33,521	-	14,918	43,598	92,036	113.35
588762	PCBHCA01	Garnet	San Diego	4157	35,331	16,450	205,652	26,977	284,411	68.42
858763	PCBHCA11	Hornblend	San Diego	548	21,747	-	-	2,583	24,330	44.40
650043	PCFCCA11	Pacifica	San Mateo	3023	16,695	-	-	32,951	49,646	16.42
951765	PDLYCA11	Pedley	Riverside	2466	188,321	27,450	-	217,471	435,505	176.60
805386	PIRUCA11	Piru	Ventura	145	-	-	2,263	6,922	15,616	107.70
650045	PLALCA02	Palo Alto Main	Santa Clara	10518	35,040	-	8,694	26,321	120,501	11.46
650046	PLALCA12	Palo Alto South	Santa Clara	4001	4,498	-	6,178	10,235	20,911	5.23
714767	PLCLCA11	Placentia	Orange	5397	262,175	-	30,639	476,847	88,35	86.35
661384	PLDCA01	Palmdale	Los Angeles	4380	16,994	-	67,842	286,824	371,660	84.85
661412	PLDCA11	Palmdale East 47TH ST	Los Angeles	902	18,403	-	-	54,149	72,552	80.43
916491	PLGVCA12	Pleasant Grove	Placer	160	7,692	-	-	12,953	129,03	129.03
209212	PLMOCA11	Plymouth	Amador	1528	15,485	-	26,520	75,102	117,107	76.64
209211	PLNDCA11	Planada	Merced	279	23,661	-	-	13,890	37,551	134.59
925047	PLTNCA12	Pleasanton Main Hopyard	Alameda	4045	88,252	-	32,432	107,133	207,817	51.38
925083	PLTNCA13	Pleasanton Hacienda	Alameda	1621	3,639	-	15,943	30,109	49,692	30.65
530489	PLVLCA11	Placerville Main	El Dorado	7102	91,856	106,515	39,373	207,348	445,092	62.67
530490	PLVLCA12	Placerville Niagara	El Dorado	2240	96,653	30,366	54,266	79,635	220,920	98.63
707315	PNCARCA11	Point Arena	Mendocino	597	17,044	26,725	10,494	29,214	83,477	139.83
209209	PNCRCA11	Pinecrest	Tuolumne	921	7,189	-	-	53,783	60,972	66.20
619766	PNVYCA11	Pine Valley	San Diego	247	-	-	10,274	15,273	25,547	103.43
858768	POWYCA11	Poway Midland	San Diego	2729	12,105	-	5,121	59,230	76,457	28.02
707313	PPWDCA11	Peppenwood	Humboldt	75	-	-	-	6,529	6,529	87.05
530486	PRDSCA11	Paradise Main	Butte	1089	14,226	-	-	62,308	76,534	70.28
530487	PRDSCA12	Paradise Pines	Butte	1026	5,388	-	21,208	67,354	93,950	91.57
559208	PRLRCA11	Parlier	Fresno	469	9,044	-	-	22,706	31,750	67.70
562649	PRMCA01	Paramount	Los Angeles	4428	156,937	-	6,523	64,670	228,130	51.52
415048	PRSNCA11	Point Reyes	Marin	825	7,250	-	4,066	6,478	17,794	21.57
925049	PSBGCA01	Pittsburg Main	Contra Costa	2490	134,981	-	19,876	99,041	253,899	101.97
925050	PSBGCA11	Pittsburg Bay Point Willow	Contra Costa	1095	11,584	-	33,712	3,076	48,373	44.18
805387	PSBHCA11	Pismo Beach	San Luis Obispo	736	2,352	-	-	51,667	54,019	73.40
650051	PSCDCA11	Pescadero	San Mateo	565	21,757	-	15,711	5,625	43,093	76.27
626650	PSDNCA11	Pasadena Mt Wilson Green	Los Angeles	12284	65,919	-	46,551	109,903	222,373	18.10
626651	PSDNCA12	Pasadena Lake	Los Angeles	5609	80,124	-	18,066	66,128	164,318	29.30
530488	PSKNCA11	Paskenta	Tehama	101	-	-	-	2,639	2,639	26.13
805385	PSRBCA01	Paso Robles	San Luis Obispo	4945	65,568	-	89,876	396,298	551,732	111.57
707314	PTLMCA01	Petaluma	Sonoma	4990	45,461	-	8,360	173,433	227,253	45.54
530492	PTOLCA01	Portola	Plumas	982	-	-	-	19,236	19,236	19.59
559213	PTVLCA11	Porterville	Tulare	4993	26,280	-	9,840	179,483	215,603	43.18

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2018 Access Lines	TFS	Type of Expenditure C&E	OSP Rehab	Plant Rehab	Total	\$ per AL
707316	PTVYCA11	Potter Valley	Mendocino	528	15,304	-	31,213	225,657	272,174	515.48
559210	PXYCA11	Pixley	Tulare	273	21,084	-	5,443	16,310	42,836	156.91
530493	QNCYCA12	Quincy	Plumas	1838	4,806	-	24,311	103,745	132,862	72.29
760769	RAMNCA11	Ramona	San Diego	1878	6,943	-	26,022	115,447	148,412	79.03
858770	RBRNCA11	Rancho Bernardo	San Diego	4178	19,521	-	595	167,213	187,328	44.84
916541	RCKLCA01	Stanford Ranch	Placer	3201	12,679	-	34,845	54,948	102,471	32.01
916527	RCKLCA11	Rocklin	Placer	1244	5,530	-	19,076	30,627	55,233	44.40
510052	RCMDCA11	Richmond SF	Contra Costa	7128	112,579	-	104,863	130,936	348,378	48.87
530496	RCVACA11	Richvale	Butte	107	-	-	-	5,405	5,405	50.52
530494	RDBLCA01	Red Bluff	Tehama	3745	30,131	-	510	90,865	121,506	32.44
650053	RDCYCA01	Redwood City	San Mateo	7949	72,968	-	118,660	33,984	225,611	28.38
530495	RDNGCA02	Redding Main	Shasta	4862	1,896	-	41,193	487,922	531,011	109.22
530531	RDNGCA11	Redding Enterpr	Shasta	3279	-	-	1,348	69,160	70,508	21.50
818652	RESDCA01	Reseda	Los Angeles	10038	246,080	19,900	58,294	278,592	602,866	60.06
707317	RIDECA11	Rio Dell	Humboldt	238	3,527	18,122	-	10,447	32,097	134.86
916526	RILNCA12	Rio Linda	Sacramento	1163	10,782	-	2,649	31,816	45,247	36.91
909773	RILTCA11	Rialto	San Bernardino	3898	155,421	-	20,935	205,356	381,712	97.93
916533	RNMRC A11	Rancho Murietta	Sacramento	523	7,952	-	-	12,235	20,188	38.60
858854	RNPSCA11	Rancho Penasquitos	San Diego	1446	-	-	-	12,207	12,207	8.44
619852	RNSDCA11	Rancho San Diego	San Diego	814	2,776	10,920	-	9,356	23,052	28.32
626654	ROSMCA11	Rosemead	Los Angeles	6423	48,539	-	-	114,867	163,405	25.44
858771	RSFECA12	Rancho Santa Fe	San Diego	3255	15,964	-	-	82,339	98,303	30.20
661388	RSMDC A11	Rosamond	Kern	1123	34,642	-	-	60,079	94,721	84.35
949808	RSMGCA11	R S Margarita	Orange	2003	22,207	-	-	6,537	28,744	14.35
707337	RTPKCA11	Rohrer Park	Sonoma	2121	3,599	-	6,023	63,090	72,712	34.28
559215	RVDLCA11	Riverdale	Fresno	336	18,860	-	-	37,271	56,131	167.06
209214	RVRBCA11	Riverbank	Stanislaus	992	-	-	261	23,328	23,589	23.78
951774	RVSDCA01	Riverside Orange	Riverside	7926	235,637	-	2,608	239,578	477,823	60.29
951775	RVSDCA11	Woodcrest	Riverside	2640	109,037	-	446	95,697	205,180	77.72
661407	SAGSCA11	Saugus	Los Angeles	2528	28,624	-	17,902	198,660	245,186	96.99
619795	SANTCA01	Santee	San Diego	2186	39,146	-	20,054	75,806	135,006	61.76
805391	SATCCA12	Saticoy	Ventura	1946	17,643	5,363	-	98,588	121,595	62.48
707321	SBSTCA11	Sebastapol	Sonoma	2794	12,227	115,570	-	174,571	351,030	125.64
916497	SCRMCA01	Sacramento Mn	Sacramento	6182	-	-	48,662	22,979	75,992	12.29
916498	SCRMCA02	SCRM Ivanhoe	Sacramento	7391	80,660	11,948	53,013	22,979	167,578	22.97
916499	SCRMCA03	SCRM Garden	Sacramento	8642	130,059	21,649	90,664	67,664	250,936	33.95
916500	SCRMCA11	SCRM Gladstone	Sacramento	6152	24,123	-	107,868	228,099	487,675	56.43
916501	SCRMCA12	SCRM Empire	Sacramento	4226	75,127	-	51,134	54,596	129,853	21.11
916502	SCRMCA13	SCRM Fruitridge	Sacramento	2983	51,557	-	5,889	75,681	156,697	37.08
916497	SCRMALR	Sequoia Pacific State	Sacramento	6182	-	28,668	5,788	41,632	127,645	42.79
916538	SCRMAMZ	P Street State	Sacramento	0	-	-	-	-	-	-
916539	SCRMATE	First Ave DMV State	Sacramento	0	-	-	-	-	-	-
831116	SCVCA01	Scotts Valley	Santa Cruz	1367	6,918	-	-	18,279	25,197	18.43
530508	SDSPCA11	Soda Springs	Nevada	527	16,856	-	-	62,541	79,397	150.66
559217	SELMCA11	Selma	Fresno	1616	9,518	-	15,689	95,807	121,015	74.89
831117	SESDCA11	Seaside	Monterey	1845	5,719	-	-	48,732	54,451	29.51
323655	SGATCA01	South Gate	Los Angeles	4611	130,574	-	320,700	91,765	543,039	117.77
530504	SGSPCA11	Shingle Springs	El Dorado	3431	125,593	34,518	8,678	99,827	268,615	78.29
661392	SHFTCA11	Shafter	Kern	772	21,249	-	12,662	65,662	99,573	128.98
530503	SHLKCA01	Shasta Lake	Shasta	342	-	-	-	101,712	101,712	297.40
818656	SHOKCA01	Sherman Oaks	Los Angeles	13316	217,532	-	11,445	373,995	602,971	45.28
760796	SHSHCA11	Shoshone	San Bernardino	137	1,060	-	-	8,439	9,499	69.34

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Access Lines	Jan 2018	TFS	Type of Expenditure	OSP Rehab	Plant Rehab	Total	\$ per AL
							C&E				
805393	SIMICA11	Simi	Ventura	7815	96,397	-	-	601,612	945,208	1,643,216	210.26
949791	SJCPCA12	S J Capistrano	Orange	4048	14,328	-	-	10,589	10,915	35,832	8.85
209220	SKTNGA01	Stockton Main	San Joaquin	7703	34,860	-	-	77,547	377,582	489,989	63.61
209221	SKTNGA11	Stockton Granite	San Joaquin	7644	87,312	-	14,979	55,531	477,341	635,162	83.09
209222	SKTNGA12	Stockton Ashley	San Joaquin	1196	56,779	-	-	19,156	58,593	134,528	112.48
209223	SKTNGA14	Stockton Redwood	San Joaquin	1471	23,505	-	-	18,655	60,393	102,554	69.72
661118	SLDDCA11	Soledad	Monterey	947	49,719	-	-	1,329	97,941	148,989	157.33
8311394	SLMNCA11	Solomint	Los Angeles	3415	67,641	-	-	13,455	316,510	397,607	116.43
831119	SLNSCA01	Salinas Main	Monterey	5792	2,428	-	(105)	21,701	86,846	110,870	19.14
831120	SLNSCA11	Hickory Salinas	Monterey	2176	8,880	-	-	-	38,862	47,742	21.94
831121	SLNSCA12	Glenview	Monterey	556	4,284	-	-	-	4,272	8,556	15.39
831122	SLNSCA13	Hunter	Monterey	680	-	-	-	-	11,406	11,406	16.77
831123	SLNSCA14	Moro	Monterey	1095	24,927	-	-	-	23,528	48,454	44.25
714797	SLVRCA11	Silverado	Orange	191	12,059	-	-	-	42,157	54,216	283.85
530507	SMAVCA11	Smartsville	Yuba	318	-	-	-	14,436	4,857	19,293	60.67
209216	SNADCA11	San Andreas	Calaveras	1238	9,111	-	-	-	50,986	110,300	89.10
714788	SNANCA01	Bush	Orange	8268	123,494	-	-	24,425	34,304	182,223	22.04
714789	SNANCA11	Bristol	Orange	9617	182,751	-	1,506	35,696	44,643	264,596	27.51
831124	SNARCA11	Santa Ana West SNAN Bolsa	Orange	2806	36,938	-	16,598	473	20,062	74,071	26.40
650055	SNBUCA02	San Bruno	Monterey	119	8,941	-	-	-	16,170	25,111	211.02
949776	SNCLCA12	San Clemente	San Mateo	9822	43,148	-	-	10,419	51,208	104,775	10.67
650056	SNCRCA11	San Carlos	Orange	2802	10,729	-	-	1,852	12,251	22,980	8.83
831125	SNCZCA01	Santa Cruz	San Mateo	6590	31,930	-	-	7,072	10,372	44,154	6.70
831126	SNCGA01	Santa Cruz Capitola	Santa Cruz	6297	36,303	-	32,778	-	68,857	112,232	17.82
619777	SNDCGA11	SNDG C Street	San Diego	5627	43,418	-	-	138	50,516	126,850	25.48
619778	SNDCGA02	SNDG University	San Diego	5448	6,109	-	-	84,922	25,629	110,551	20.29
858779	SNDCGA03	SNDG Linda Vista	San Diego	8083	142,402	-	-	129,442	58,676	330,520	40.89
619780	SNDCGA05	SNDG Saipan	San Diego	2182	48,147	-	-	15,884	42,147	106,177	48.66
619781	SNDCGA06	SNDG 37th Street	San Diego	3952	-	-	-	22,758	31,480	54,238	13.72
619782	SNDCGA11	SNDG College	San Diego	2566	4,797	-	-	100,679	51,720	157,196	61.26
619783	SNDCGA12	SNDG Market Street	San Diego	2184	-	-	1,443	8,782	23,640	33,865	15.51
619784	SNDCGA14	SNDG Tennyson	San Diego	2848	-	-	-	20,879	13,817	34,696	12.18
858785	SNDCGA15	SNDG Regents	San Diego	6954	38,973	-	-	19,644	20,501	79,119	11.38
415058	SNFCCA01	SNDG Mira Mesa	San Diego	5310	22,686	-	1	3,911	43,429	70,026	13.19
415059	SNFCCA04	SF Bush Pine	San Francisco	14854	20,554	-	-	209,913	88,906	319,373	21.50
415060	SNFCCA05	SF Market McCoppin	San Francisco	10962	34,072	-	5	297,687	167,993	499,757	45.59
415061	SNFCCA06	SF Mission 25th St	San Francisco	10082	30,397	-	-	90,862	126,296	247,554	24.55
415067	SNFCCA12	SF Juniper Onondaga	San Francisco	11364	38,975	-	67,367	43,919	143,306	293,567	25.83
415064	SNFCCA13	SF Larkin Steiner	San Francisco	22366	57,711	-	-	210,149	183,049	450,909	20.16
415065	SNFCCA14	SF Evergreen 9th Ave	San Francisco	9186	20,088	-	-	88,508	59,649	191,019	20.79
415066	SNFCCA17	SF Montrose 19th	San Francisco	11765	47,230	-	-	52,098	133,262	232,590	19.77
415068	SNFCCA21	SF Third St	San Mateo	4510	34,422	-	-	60,277	75,919	170,617	37.83
415084	SNFCCA64	SF Folsom	San Francisco	7656	2,783	-	-	5,116	50,546	58,445	7.63
626658	SNGBCA01	San Gabriel	Los Angeles	0	-	-	-	453	714	1,167	-
831127	SNJNCA11	San Gerónimo	San Benito	4610	119,110	-	19,071	14,725	82,649	235,554	51.10
408129	SNJSCA02	San Jose Main	San Clara	461	7,090	-	-	-	21,479	28,570	61.97
408130	SNJSCA11	San Jose White Rd	San Clara	12910	48,007	-	-	-	7,077	7,077	18.43
408131	SNJSCA12	San Jose Dial Way	San Clara	8051	79,854	-	20,609	86,242	119,703	253,953	19.67
408131	SNJSCA13	San Jose Chynoweth	San Clara	13069	98,959	-	-	41,526	170,433	312,421	36.81
				7594	330,213	-	-	-	183,044	282,004	21.58
						-	-	63,147	228,393	621,753	81.87

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLLI	WC Name	County	Jan 2018 Access Lines	TFS	Type of Expenditure C&E	OSP Rehab	Plant Rehab	Total	\$ per AL
408132	SNJSCA14	San Jose Foxworthy	Santa Clara	9411	35,923	-	368,922	159,233	564,078	59.94
408133	SNJSCA15	San Jose Evergreen	Santa Clara	5113	162,074	-	26,317	171,889	360,280	70.46
408134	SNJSCA18	San Jose Almaden Valley	Santa Clara	2877	62,250	-	51,863	88,855	202,967	70.55
408142	SNJSCA21	San Jose Junction	Santa Clara	6140	12,255	-	10,204	21,670	44,129	7.19
408142	SNJSCA22	San Jose Bailey	Santa Clara	149	20,076	-	1,027	4,748	25,850	173.49
831135	SNLCCA11	San Lucas	Monterey	43	2,597	-	-	18,965	21,562	501.45
510070	SNLNLCA11	San Leandro	Alameda	8284	73,345	-	90,169	48,946	212,461	25.65
805389	SNLLOCA01	San Luis Obispo	San Luis Obispo	4352	57,268	-	203,281	314,465	575,015	132.13
408136	SNMACA11	San Martin	Santa Clara	632	67,068	-	-	13,997	81,065	128.27
760792	SNMCCA11	San Marcos	San Diego	4889	74,626	1,511	35,906	307,606	419,648	85.84
805390	SNMICA11	Santa Margarita	San Luis Obispo	540	10,218	-	11,595	21,114	42,927	79.49
650071	SNMTC A11	San Mateo	San Mateo	7900	62,348	-	65,773	50,133	178,254	22.56
310659	SNPDCA01	San Pedro	Los Angeles	7437	234,508	-	66,102	102,926	403,536	54.26
209218	SNRACA13	Sonora	Tuolumne	4857	138,003	-	25,875	248,553	412,432	84.91
415072	SNRFA01	San Rafael Main	Marin	6998	34,428	-	67,252	71,051	172,731	24.68
415073	SNRFCA11	Parkway	Marin	2956	5,185	-	5,637	10,529	7,222	7.22
925074	SNRMCA11	San Ramon	Alameda	4197	13,149	-	-	156,382	169,531	40.39
707320	SNRSCA01	Santa Rosa Main	Sonoma	11549	49,795	-	20,522	664,086	734,403	63.59
707319	SNRSCA11	Los Alamos	Sonoma	2537	6,556	-	14,382	91,433	91,433	36.04
408143	SNRCCA01	Santa Clara Spacepark	Santa Clara	4768	15,339	-	31,045	86,502	123,847	18.14
408137	SNRCCA11	Santa Clara Bellomy	Santa Clara	8974	49,200	-	35,012	91,735	175,946	19.61
408138	SNVACA01	Carroll Sunnyvale	Santa Clara	7759	21,755	39	39,351	86,439	147,584	19.02
408139	SNVACA11	Mahilda Sunnyvale	Santa Clara	1662	-	2,338	5,274	9,961	15,573	9.37
619794	SNYSACA12	San Ysidro	San Diego	1283	36,799	-	-	15,555	52,354	40.81
707323	SONMCA12	Sonoma	Sonoma	3961	20,223	15,929	98,020	96,479	230,651	58.23
626660	SPSDCA11	Sout Pasadena Mission	Los Angeles	2834	16,373	-	2,853	9,933	29,159	10.29
559219	SPVLC A11	Springville	Tulare	751	-	-	14,980	29,158	44,138	58.77
530505	SRFYCA11	Sierra City	Sierra	430	-	-	-	10,677	10,677	24.83
559224	SRFRCA11	Stratford	Kings	85	-	-	2,416	11,991	169,49	169.49
530506	SRVLC A11	Sierraville	Sierra	162	-	-	-	4,145	4,145	25.59
415075	SSLTCA11	Sausalito Larkspur	Marin	1737	3,558	-	-	14,275	17,833	10.27
530509	STAHCA01	South Tahoe Sussex	El Dorado	2731	1,033	-	-	71,198	72,231	26.45
530511	STAHCA12	South Tahoe Tamarack	El Dorado	128	-	-	3,563	2,479	6,042	47.20
530512	STAHCA13	South Tahoe Meyers Apache	El Dorado	785	7,615	-	3,382	15,232	26,229	33.41
415076	STBHCA11	Slinson Beach	Marin	1202	10,521	-	7,883	15,235	33,640	27.99
209225	STCKCA11	Suiter Creek	Amador	697	8,077	-	1,572	34,827	44,477	63.81
530513	STFRCA11	Stonyford	Colusa	138	3,689	-	-	1,747	5,436	39.39
707318	STHNCA11	Napa	Napa	2372	20,797	-	32,261	46,813	99,871	42.10
707324	SUISCA11	Suisun City	Solano	345	-	-	-	11,330	11,330	32.84
925077	SUNLCA11	Sunol	Alameda	191	15,073	-	-	29,532	44,606	233.54
415005	TBRNCA11	Tiburon	Marin	1686	-	-	-	3,569	3,569	2.12
661395	THCHCA01	Techachapi	Kern	1787	28,977	-	-	155,210	184,186	103.07
530514	THCYCA01	Tahoe City	Placer	2438	2,419	-	-	50,579	52,998	21.74
559228	THRRCA11	Three Rivers	Tulare	609	-	59,250	3,434	36,863	99,547	163.46
209227	THTNCA11	Thomton	San Joaquin	100	23,562	-	2,429	13,926	39,916	399.16
707325	TMLSCA12	Tomesles	Sonoma	287	4,570	-	12,069	10,979	27,618	96.23
805396	TMTNCA11	Templeton	San Luis Obispo	643	9,364	-	-	39,990	49,354	76.76
559229	TPTNCA11	Tipton	Tulare	199	7,067	-	1,923	23,866	32,856	165.11
209230	TRACCA11	Tracy	San Joaquin	4319	-	-	13,499	376,906	390,405	90.39
559226	TRBLCA11	Terra Bella	Tulare	417	41,797	-	2,169	26,807	70,772	169.72
209232	TRLCA11	Turlock	Stanislaus	6746	78,814	-	29,773	270,775	379,362	56.24
310661	TRNCCA11	Torrance	Los Angeles	4260	171,620	-	8,134	41,232	220,986	51.87

Table 7.16 REHABILITATION EXPENDITURES BY WIRE CENTER 2018-2019 (continued)

WC	CLI	WC Name	County	Jan 2018 Access Lines	TFS	Type of Expenditure C&E	OSP Rehab	Plant Rehab	Total	\$ per AL
707326	TRNDCA11	Trinidad	Humboldt	296	11,203	3,282	-	12,744	27,229	91.99
831140	TRPSCA11	Tres Pinos	San Benito	214	-	-	-	4,801	4,801	22.44
530515	TRUCCA11	Truckee	Nevada	3351	8,313	-	39,378	69,710	117,401	35.03
530516	TRUCCA12	North Star	Placer	606	-	-	-	7,483	7,483	12.35
559231	TULRCA11	Tulare	Tulare	3875	73,954	-	15,273	278,003	367,230	94.77
714798	TUSTCA11	Tustin 11	Orange	6962	74,274	-	21,884	38,592	134,751	19.36
714805	TUSTCA70	Tustin 70	Orange	658	-	-	-	2,698	2,698	4.10
209233	TWHRCA11	Twain Harle	Tuolumne	1607	42,552	-	759	78,964	122,275	76.09
707328	UKHCA01	Ukiah Main	Mendocino	3947	10,086	53,169	52,927	200,292	316,473	80.18
707327	UKHCA12	Capella Ivanhoe	Mendocino	995	18,740	-	7,784	70,699	97,224	97.71
510078	UNCYCA11	Union City	Alameda	4821	115,403	4,587	66,082	114,341	300,413	62.31
707329	UPLKCA11	Upper Lake	Lake	388	7,481	-	11,264	64,894	83,640	215.57
707330	CVLCA12	Vacaville	Solano	5328	71,566	68,047	27,962	304,243	471,817	88.55
530517	VINACA12	Vina	Tehama	69	-	-	-	10,211	10,211	147.98
559235	VISLCA11	Visalia Main	Tulare	6971	50,321	-	44,586	546,421	641,327	92.00
760800	VISTCA12	Visia	San Diego	5720	74,500	-	14,307	304,384	393,191	66.74
760799	VLCTCA11	Valley Center	San Diego	2286	25,637	-	8,294	123,425	157,356	68.83
707331	VLLUCA01	Vallejo	Solano	6162	86,010	-	7,323	895,176	988,509	160.42
818662	VNNYCA02	Van Nuys	Los Angeles	10196	208,292	15,266	15,404	290,772	529,734	51.96
805400	VNTRCA02	Ventura Fir	Ventura	2365	15,012	-	13,364	133,426	163,802	66.26
805399	VNTRCA11	Ventura Main Montalvo	Ventura	4798	16,793	6,318	13,886	258,154	295,151	61.52
707332	VYFRCA11	Valley Ford	Sonoma	184	3,905	-	4,813	23,705	32,423	176.21
209234	VYSPCA11	Valley Springs	Calaveras	1100	22,166	14,574	904	55,310	92,954	84.50
209238	WANACA11	Wawana	Mariposa	267	-	-	-	13,352	13,352	50.01
861402	WASCCA01	Wasco	Kern	774	2,323	-	2,661	61,287	66,272	85.62
530523	WDLCA11	Woodland	Yolo	4358	3,969	-	17,966	159,196	181,131	41.56
559239	WDLKCA11	Woodlake	Tulare	533	85,799	-	-	44,379	130,178	244.24
530518	WEEDCA01	Weed	Siskiyou	847	-	-	-	13,016	13,016	15.37
707333	WEOTCA11	Weott	Humboldt	63	-	-	-	20,157	20,157	319.96
310663	WLANCA01	Century City	Los Angeles	5791	39,571	-	7,302	8,495	55,368	9.56
661401	WLBSCA11	Walker Basin	Kern	447	25,453	-	-	36,403	61,856	138.38
209236	WLLCCA11	Wallace	Calaveras	400	-	-	-	44,903	44,903	112.26
310664	WLMGCA01	Wilmington	Los Angeles	5429	171,156	-	172,764	26,194	370,114	68.17
707334	WLTSCA12	Willits	Mendocino	2049	33,490	-	94,396	174,289	302,155	147.46
530521	WMLWCA11	Willows	Glenn	989	9,907	-	8,481	34,995	53,383	53.98
925079	WNCKCA11	Walnut Creek	Contra Costa	11153	84,117	-	256,833	165,582	506,532	45.42
707335	WNDSCA11	Windsor	Sonoma	1693	10,542	-	56,570	67,370	134,483	79.43
760801	WNSPCA12	Warner Springs	San Diego	373	11,323	-	-	25,772	37,095	99.45
530522	WNTRCA11	Winters	Yolo	734	23,675	-	-	39,385	63,060	85.91
916519	WSGRCA11	Frontier	Sacramento	3690	36,830	2,552	97,909	27,276	164,566	44.60
530520	WTLRCA11	Waterford	Stanislaus	758	39,264	-	7,575	62,111	108,950	143.73
831141	WTVLCA01	Watsonville	Sutter	497	-	-	18,764	18,995	37,759	75.97
530525	YBCYCA01	Yuba City Marysville	Santa Cruz	7582	84,050	8,403	-	107,312	199,766	26.35
707336	YNVLCAL11	Yountville	Sutter	4625	-	-	23,620	106,720	130,340	28.18
530524	YREKCA11	Yreka	Napa	819	3,410	-	5,236	18,898	27,544	33.63
714802	YRLNCA11	Yorba Linda	Siskiyou	1314	-	-	-	13,848	13,848	10.54
714809	YRLNCA12	Gypsum Canyon	Orange	3299	176,263	-	-	172,512	348,775	105.72
209240	YSMTCA11	Yosemite Main	Orange	562	10,180	-	-	24,721	34,901	62.10
209241	YSMTCA11	Yosemite Main	Mariposa	529	-	-	-	79,884	79,884	151.01
209240	YSMTCA12	El Portal	Mariposa	299	-	-	12,103	32,554	44,657	149.35
TOTALS 2018-2019										
				1,915,900	28,021,812	2,060,343	20,395,286	56,734,288	107,211,728	55.96

Table 7.17

AT&T CALIFORNIA

COMPARISON OF GO 133-D \$9.7 "ALTERNATIVE PROPOSED INVESTMENTS" AND TOTAL REHAB EXPENDITURES 2018-2019

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
661410	ACTNCA11	Acton	Los Angeles	743	-	122,841	0.00%
661351	AGDLCA11	Agua Dulce	Los Angeles	456	-	311,170	0.00%
818600	AGORCA11	Agoura	Los Angeles	4858	-	951,226	0.00%
510001	ALBYCA11	Albany Solano	Alameda	6236	21,550	92,458	23.31%
530425	ALGHCA11	Alleghany	Sierra	47	-	15,482	0.00%
626601	ALHBCA01	Alhambra	Los Angeles	8889	-	232,806	0.00%
510002	ALMDCA11	Alameda Central	Alameda	6355	5,120	185,433	2.76%
619700	ALPICA12	Alpine	San Diego	1624	47,280	118,847	39.78%
209150	ANCMCA01	Angels Camp	Calaveras	809	-	100,528	0.00%
707275	ANGWCA11	Angwin	Napa	591	-	36,041	0.00%
714701	ANHMCA01	Anaheim Lemon	Orange	7849	-	321,767	0.00%
714702	ANHMCA11	Anaheim Cypress	Orange	7686	-	719,465	0.00%
714703	ANHMCA12	Anaheim La Palm: Orange	Orange	1791	-	194,078	0.00%
714811	ANHMCA17	ANHM Hills	Orange	848	-	52,121	0.00%
707322	ANNPCA11	Annapolis	Sonoma	71	-	12,067	0.00%
925003	ANTCCA11	Antioch	Contra Costa	5049	-	383,040	0.00%
831100	APTSCA12	Aptos	Santa Cruz	2864	6,466	76,438	8.46%
626602	ARCDCA11	Arcadia	Los Angeles	4800	-	168,770	0.00%
707276	ARCTCA11	Arcata	Humboldt	1835	-	89,453	0.00%
805352	ARGRCA12	Arroyo Grande	San Luis Obispo	3827	-	389,592	0.00%
831144	ARMSCA11	Aromas	San Benito	446	-	52,895	0.00%
209151	ARNLCA11	Arnold	Calaveras	1936	-	197,594	0.00%
530427	ARSNCA11	Anderson	Shasta	1747	-	79,134	0.00%
951704	ARTNCA11	Arlington	Riverside	5896	-	477,090	0.00%
661353	ARVNCA11	Arvin	Kern	736	-	146,034	0.00%
559152	ASMTCA11	Sequoia Ash Mtn	Fresno	82	-	54,554	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
805354	ATSCCA11	Atascadero	San Luis Obispo	2312	-	169,359	0.00%
209153	ATWRCA12	Atwater	Merced	1837	-	257,259	0.00%
530428	AUBNCA01	Auburn Main	Placer	5789	-	172,598	0.00%
530429	AUBNCA11	Auburn Placer Hill/Placer	Placer	1530	-	56,761	0.00%
805355	AVBHCA11	Avila Beach	San Luis Obispo	337	-	19,066	0.00%
559154	AVNLCA12	Avenal	Kings	434	-	52,681	0.00%
760705	BAKRCA11	Baker	San Bernardino	114	-	1,308	0.00%
949706	BALBCA01	Balboa	Orange	2703	-	51,441	0.00%
530434	BCWYCA11	Brockway	Placer	924	-	23,972	0.00%
707279	BDBACA11	Bodega Bay	Sonoma	336	-	83,346	0.00%
530431	BEALCA11	Beale	Yuba	78	-	4,622	0.00%
323604	BELLC A11	Bell	Los Angeles	2449	-	214,911	0.00%
530432	BGGSCA11	Biggs	Butte	249	-	33,362	0.00%
831101	BGSRCA11	Big Sur	Monterey	389	-	122,197	0.00%
707281	BGVLCA11	Bridgeville	Humboldt	173	-	89,077	0.00%
661356	BKFDCA11	Bakersfield Empirc Kern	Los Angeles	1142	-	501,216	0.00%
661357	BKFDCA12	Bakersfield Main F Kern	Los Angeles	6158	-	1,338,241	0.00%
661358	BKFDCA13	Bakersfield Colum Kern	Los Angeles	2365	-	439,850	0.00%
661359	BKFDCA14	Bakersfield Tempil Kern	Los Angeles	6693	-	1,678,481	0.00%
661360	BKFDCA15	Bakersfield Mettlei Kern	Los Angeles	299	-	88,208	0.00%
661361	BKFDCA17	Bakersfield West F Kern	Los Angeles	3311	-	307,839	0.00%
661409	BKFDCA19	Bakersfield Nomar Kern	Los Angeles	1972	-	123,092	0.00%
510004	BKLYCA01	Berkeley Bancroft Alameda	Alameda	8600	-	98,859	0.00%
831102	BLCKCA11	Boulder Creek	Santa Cruz	1051	51,244	106,508	48.11%
707278	BLLKCA11	Blue Lake	Humboldt	236	-	58,019	0.00%
530433	BLRSCA12	Blairsden	Plumas	901	-	49,064	0.00%
707277	BNCICA11	Benicia	Solano	1943	-	185,031	0.00%
530430	BNGRCA11	Bangor	Butte	335	-	13,720	0.00%
831103	BNLMCA11	Ben Lomond	Santa Cruz	579	-	33,465	0.00%
714710	BNPKCA11	Buena Park	Orange	4388	-	340,621	0.00%
707280	BNVLCA11	Boonville	Mendocino	645	12,118	121,299	0.00%
818605	BRBNCA11	Burbank Palm	Los Angeles	9868	-	671,797	9.99%
818606	BRBNCA13	Burbank Thornton	Los Angeles	755	-	6,093	0.00%
805363	BRDLCA90	Bradley	Monterey	495	-	42,059	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
714709	BREACA12	Brea	Orange	2998	-	326,264	0.00%
650006	BRLNCA01	Burlingame	San Mateo	7936	72,737	106,149	68.52%
760707	BRSPCA11	Borrego Springs	San Diego	698	-	32,948	0.00%
925007	BRWDCA12	Brentwood	Contra Costa	3696	-	129,956	0.00%
760708	BRWLCA11	Brawley	Imperial	1759	-	108,509	0.00%
925082	BSRNCA70	Bishop Ranch	Contra Costa	1443	-	20,613	0.00%
530435	BTCYCA11	Butte City	Glenn	109	-	423	0.00%
925008	BTISCA11	Bethel Island	Contra Costa	265	-	21,915	0.00%
559242	BURLCA11	Burrell	Fresno	88	-	40,135	0.00%
310607	BVHLCA01	Beverly Hills	Los Angeles	16372	-	320,349	0.00%
209155	BVLYCA11	Bear Valley	Calaveras	436	-	40,343	0.00%
661403	BVSPCA11	Bear Villy Spring	Kern	334	-	74,992	0.00%
805362	BYPKCA11	Baywood Park	San Luis Obispo	920	-	151,562	0.00%
619715	CAMPCA11	Campo	San Diego	474	-	56,282	0.00%
707285	CBMTCA11	Cobb Mountain	Lake	317	-	77,134	0.00%
530438	CHICCA01	Chico Main	Butte	10221	6,955	287,579	2.42%
530437	CHLNCA11	Challange	Yuba	1149	-	22,682	0.00%
831104	CHLRCA11	Chualar	Monterey	136	-	28,848	0.00%
619718	CHVSCA11	Chula Vista Third / San Diego	San Diego	3894	8,957	165,333	5.42%
619719	CHVSCA12	Chula Vista Apach San Diego	San Diego	2258	5,956	44,012	13.53%
559158	CHWCCA11	Chowchilla	Madera	963	-	166,189	0.00%
818666	CLBSCA11	Calabasas Park S/ Los Angeles	Los Angeles	3840	-	300,793	0.00%
818665	CLBSCA50	Calabasas Los Vir Los Angeles	Los Angeles	1058	-	23,283	0.00%
310608	CLCYCA11	Culver City	Los Angeles	7964	-	277,935	0.00%
559160	CLNGCA01	Coalinga	Fresno	817	-	128,060	0.00%
707283	CLOKCA11	Clear Lake Oaks	Lake	536	-	19,221	0.00%
760713	CLPTCA11	Calpatria	Imperial	259	-	28,477	0.00%
707282	CLSTCA11	Calistoga	Napa	1111	-	146,784	0.00%
559159	CLVSCA11	Clovis	Fresno	8311	19,168	881,838	2.17%
760712	CLXCCA12	Calexico	Imperial	1886	-	40,026	0.00%
805364	CMBACA11	Cambria	San Luis Obispo	1435	-	170,952	0.00%
559156	CMNLCA11	Camp Nelson	Tulare	680	-	11,900	0.00%
760714	CMPDCA01	Camp Pendleton	San Diego	107	-	5,250	0.00%
530436	CMPVCA11	Camptonville	Yuba	216	-	19,650	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
310609	CMTNCA01	Compton	Los Angeles	9969	51,395	1,171,795	4.39%
925009	CNCRCA01	Concord	Contra Costa	8980	-	332,450	0.00%
818610	CNPKCA01	Canoga Park	Los Angeles	13344	16,043	1,356,631	1.18%
530528	CNVYCA11	Central Valley	Shasta	1528	23,261	47,627	48.84%
707284	CODLCA11	Cloverdale	Sonoma	832	-	130,963	0.00%
650010	COLACA01	Colma Daly City	San Mateo	5878	39,715	159,553	24.89%
707286	CORDCA12	Cordelia	Solano	1340	-	51,378	0.00%
951721	CORNCA11	Corona	Riverside	10738	12,733	1,015,536	1.25%
909720	COTNCA11	Colton	San Bernardino	3205	-	304,731	0.00%
510011	CRCTCA02	Crockett	Contra Costa	289	-	1,666	0.00%
949722	CRDMCA11	Corona Del Mar	Orange	6350	-	132,880	0.00%
760716	CRLSCA11	Carlsbad Harding	San Diego	2206	-	98,008	0.00%
760717	CRLSCA12	Carlsbad La Costa	San Diego	3662	-	62,771	0.00%
831105	CRMLCA11	Carmel Main	Monterey	4592	4,577	406,060	1.13%
619723	CRNDCA11	Coronado	San Diego	1724	10,589	13,839	76.52%
530440	CRNGCA12	Corning	Tehama	1179	-	89,716	0.00%
559157	CRTHCA11	Caruthers	Fresno	383	-	29,715	0.00%
831106	CRVYCA11	Carmel Valley	Monterey	1039	-	61,473	0.00%
949725	CSMSCA11	Costa Mesa	Orange	5737	-	178,369	0.00%
661408	CSTCCA11	Castaic	Los Angeles	3431	-	201,094	0.00%
831107	CSVLCA11	Castroville	Monterey	1012	-	24,845	0.00%
707287	CTTICA12	Cotati	Sonoma	1983	11,393	71,216	16.00%
209161	CTVLCA11	Coulterville	Mariposa	663	-	75,405	0.00%
530441	CTWDCA11	Cottonwood	Tehama	2138	45,885	116,846	39.27%
209162	CWLDCA12	Crows Landing	Stanislaus	91	-	9,812	0.00%
805366	CYCSCA11	Cayucos	San Luis Obispo	526	-	68,635	0.00%
925081	CYTNCA11	Clayton	Contra Costa	1502	-	71,233	0.00%
760726	CYWLCA11	Coyote Wells	Imperial	46	-	1,680	0.00%
925012	DAVLCA12	Danville Main 12	Contra Costa	5110	-	303,232	0.00%
925085	DAVLCA13	Danville Tassajara	Contra Costa	2391	-	53,030	0.00%
530442	DAVSCA11	Davis	Yolo	4191	-	143,752	0.00%
661367	DELNCA11	Delano	Tulare	1939	48,637	230,364	21.11%
559164	DINBCA01	Dinuba	Tulare	1352	-	78,090	0.00%
707443	DIXNCA11	Dixon	Solano	1345	-	110,688	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
858727	DLMRCA12	Del Mar	San Diego	5494	-	40,412	0.00%
559163	DLRYCA11	Del Rey	Fresno	143	-	21,705	0.00%
619728	DLZRCA11	Dulzura	San Diego	504	-	28,378	0.00%
530445	DNGNCA12	Dunnigan	Yolo	113	-	18,518	0.00%
530446	DNSMCA11	Dunsmuir	Siskiyou	413	-	19,473	0.00%
530447	DTFLCA11	Alta Dutch Flats	Placer	538	-	43,835	0.00%
530444	DWNVCA11	Downtonville	Sierra	239	-	8,963	0.00%
661369	EDWRCA01	Edwards	Kern	137	-	6,702	0.00%
530448	EKCKCA11	Elk Creek	Glenn	100	-	14,917	0.00%
619729	ELCJCA11	El Cajon	San Diego	4004	4,702	326,642	0.00%
760730	ELCNCA01	El Centro	Imperial	3848	2,151	156,017	1.44%
707288	ELK CA11	Elk	Mendocino	211	8,060	8,477	1.38%
626611	ELMNCA01	El Monte	Los Angeles	9210	7,436	260,083	95.08%
510013	ELSBCA11	Rich Appian Way Contra Costa	Los Angeles	3219	-	150,753	2.86%
310613	ELSGCA12	El Segundo Dougl	Los Angeles	4029	-	42,748	0.00%
949731	ELTRCA11	El Toro	Orange	10967	14,400	161,360	0.00%
760732	ENCTCA12	Encinitas	San Diego	4571	-	234,551	8.92%
661368	ERLMCA11	Earlmar	Tulare	332	-	49,860	0.00%
209192	ESCLCA11	Escalon	San Joaquin	929	-	32,958	0.00%
760733	ESCNCA01	Escondido	San Diego	7483	-	988,311	0.00%
530450	ESPRCA11	Esparto	Yolo	266	-	29,375	0.00%
707289	EURKCA01	Eureka	Humboldt	4799	-	127,638	0.00%
831108	FETNCA11	Felton	Santa Cruz	976	-	26,254	0.00%
760735	FLBKCA12	Fallbrook	San Diego	3475	-	356,664	0.00%
805370	FLMRCA11	Fillmore	Ventura	791	-	58,884	0.00%
916453	FLSMCA12	Folsom Nimbus	Sacramento	1844	26,554	114,499	23.19%
916454	FLSMCA13	Folsom El Dorado	Sacramento	2631	-	172,078	0.00%
916536	FLSMCA14	Folsom Blue Ravir	Sacramento	1768	39,374	49,751	79.14%
909736	FNTACA11	Fontana	San Bernardino	5840	-	829,593	0.00%
559166	FRBHCA11	Firebaugh	Fresno	604	-	63,246	0.00%
760738	FRCKCA11	Furnace Creek	San Bernardino	140	-	5,860	0.00%
707290	FRFDCA01	Fairfield	Solano	5082	32,398	345,379	0.00%
530455	FRGLCA11	French Gulch	Shasta	82	-	21,966	9.38%
510014	FRMTCA11	Fremont Main 11	Alameda	7958	-	461,388	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
510015	FRMTC12	Fremont Adams	O Alameda	6839	-	260,114	0.00%
916451	FROKCA11	Fair Oaks	Sacramento	7463	56,582	362,215	15.62%
559168	FRSNCA01	Fresno Main	Fresno	7618	8,285	783,227	1.06%
559169	FRSNCA11	Fresno Baldwin	Fresno	5377	-	275,888	0.00%
559172	FRSNCA12	Fresno Clinton	Fresno	4088	-	273,821	0.00%
559170	FRSNCA13	Fresno Sierra	Fresno	6388	-	641,601	0.00%
559245	FRSNCA14	Fresno West High	Fresno	3283	80,144	335,224	23.91%
559247	FRSNCA15	Fresno Woodward	Fresno	1076	-	69,414	0.00%
559165	FRVLC11	Farmersville	Tulare	401	-	27,801	0.00%
707291	FSVLC11	Forestville	Sonoma	737	-	147,241	0.00%
707292	FTBRCA02	Fort Bragg	Mendocino	3227	49,006	571,959	8.57%
707293	FTUNCA11	Fortuna	Humboldt	1102	-	38,148	0.00%
714737	FUTNCA01	Fullerton	Orange	8005	-	559,318	0.00%
559167	FVPNCA11	Five Points	Fresno	151	-	22,427	0.00%
661371	FZPKCA11	Frazier Park	Kern	757	-	255,429	0.00%
209171	GALTC11	Galt	Sacramento	1448	-	95,444	0.00%
818614	GLDLCA11	Glendale	Los Angeles	14660	-	644,655	0.00%
831109	GNFDC11	Green Field	Monterey	940	-	185,052	0.00%
831110	GNZLCA11	Gonzales	Monterey	542	-	68,897	0.00%
530458	GRBRCA11	Gerber	Tehama	182	-	20,926	0.00%
530461	GRDLCA11	Gridley	Butte	797	-	43,743	0.00%
310615	GRDNCA01	Gardena	Los Angeles	11967	-	1,293,390	0.00%
714739	GRGVCA01	Euclid	Orange	6721	-	66,526	0.00%
530460	GRNDCA13	Grenada	Siskiyou	81	-	3,010	0.00%
530457	GRTWCA11	Georgetown	El Dorado	1339	40,908	100,410	40.74%
530459	GRVYCA01	Grass Valley	Nevada	7879	28,787	284,966	10.10%
530532	GRVYCA11	Lake of the Pine	Nevada	1863	-	25,960	0.00%
530535	GRVYCA12	Wildwood	Nevada	1442	13,769	76,597	17.98%
559246	GSHNCA11	Goshen	Tulare	730	-	26,113	0.00%
707295	GULLCA11	Gualala	Mendocino	1066	-	96,671	0.00%
209174	GUSTCA11	Gustine	Merced	604	-	59,174	0.00%
707296	GUVLCA11	Guerneville	Sonoma	691	-	89,939	0.00%
209173	GVLDC11	Groveland	Tuolumne	1863	-	205,768	0.00%
707294	GYVLC11	Geyersville	Sonoma	295	-	32,547	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
530456	GZLLCA11	Gazelle	Siskiyou	44	-	-	#DIV/0!
209176	HERLCA11	Herald	Sacramento	273	-	62,776	0.00%
909741	HGLDCA11	Highland	San Bernardino	2208	-	260,788	0.00%
209177	HGSNCA11	Hughson	Stanislaus	531	-	49,456	0.00%
707297	HLBGCA11	Healdsburg	Sonoma	2672	16,075	162,508	9.89%
831111	HLSTCA11	Hollister	San Benito	2923	-	60,953	0.00%
760742	HLVLC A11	Holtville	Imperial	458	-	36,118	0.00%
323616	HLWDCA01	Hollywood	Los Angeles	9481	-	530,927	0.00%
650016	HMBACA12	Half Moon Bay	San Mateo	2349	37,312	91,019	40.99%
530462	HMCYCA11	Hamilton City	Glenn	145	-	9,970	0.00%
530463	HMWDCA11	Homewood	El Dorado	1117	-	41,885	0.00%
559175	HNFRC A01	Hanford	Kings	3748	-	381,264	0.00%
323617	HNPKCA01	Huntington Park	Los Angeles	6751	-	406,759	0.00%
707298	HPLDCA12	Hopland	Mendocino	201	-	25,981	0.00%
530464	HRBKCA11	Hornbrook	Siskiyou	260	-	33,227	0.00%
510080	HRCLCA11	Hercules Pinole	Contra Costa	2622	-	45,967	0.00%
559178	HURNCA11	Huron	Fresno	294	-	18,336	0.00%
310618	HWTHCA01	Hawthorne	Los Angeles	5016	-	72,255	0.00%
707299	HYVLC A11	Hydesville	Humboldt	265	-	17,119	0.00%
510017	HYWRCA01	Hayward Main	Alameda	7870	-	125,529	0.00%
510018	HYWRCA11	Hayward Depot	Alameda	5286	-	143,013	0.00%
415019	IGNCCA12	Ignacio	Marin	1539	-	17,718	0.00%
310619	IGWDCA01	Inglewood	Los Angeles	5028	-	79,328	0.00%
619744	IMBHCA11	Imperial Beach	San Diego	2049	12,190	99,724	12.22%
760743	IMPRCA11	Imperial	Imperial	559	-	19,900	0.00%
415020	INVRCA11	Inverness	Marin	447	-	16,784	0.00%
209179	IONECA11	Ione	Amador	874	-	112,159	0.00%
949745	IRVNCA01	Irvine	Orange	4684	-	122,428	0.00%
949807	IRVNCA11	Irvine Airport	Orange	5656	-	31,116	0.00%
949810	IRVNCA12	Spectrum Irvine	Orange	1708	-	948	0.00%
559180	IVNHCA11	Ivanhoe	Tulare	441	-	193,296	0.00%
619851	JAMLCA60	Jamul	San Diego	322	-	13,013	0.00%
619746	JCMBCA11	Jacumba	San Diego	371	-	21,592	0.00%
209181	JCSNCA01	Jackson	Amador	1451	-	102,215	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
209182	JMTWCA11	Jamestown	Tuolumne	800	-	86,889	0.00%
760748	JULNCA12	Julian	San Diego	879	-	106,381	0.00%
559183	KGBGCA11	Kingsburg	Tulare	1028	-	74,271	0.00%
831112	KGCYCA11	King City	Monterey	1327	-	212,905	0.00%
707300	KLVLCA12	Kelseyville	Lake	1095	-	106,107	0.00%
209184	KNFYCA11	Knights Ferry	Stanislaus	141	4,871	7,234	67.33%
530465	KYBRCA11	Kyburz	El Dorado	60	-	8,164	0.00%
818620	LACNCA11	La Canada Oak G	Los Angeles	14	-	7,013	0.00%
818621	LACRCA11	La Crescenta	Los Angeles	6224	-	402,615	0.00%
650021	LAHNCA11	La Honda	San Mateo	389	-	22,156	0.00%
858750	LAJLCA11	La Jolla Girard	San Diego	3647	16,281	63,981	25.45%
619752	LAMSCA01	La Mesa	San Diego	5791	29,460	338,207	8.71%
661372	LAMTCA11	Lamont	Kern	719	-	103,911	0.00%
559186	LATNCA11	Laton	Fresno	182	-	14,000	0.00%
209190	LCFRCA11	Lockeford	San Joaquin	241	-	40,677	0.00%
661373	LEBCCA11	Lebec	Kern	386	-	74,689	0.00%
661404	LEBCCA12	Pine Mountain	Kern	678	-	39,041	0.00%
559188	LEMCA11	Lemore Main	Kings	1200	-	156,276	10.11%
559189	LEMCA12	Lemore Wyman	Kings	87	15,802	3,883	0.00%
925022	LFYTCA11	Lafayette	Contra Costa	2283	-	38,824	0.00%
949749	LGNGCA12	Laguna Niguel	Orange	3371	-	40,081	0.00%
209187	LGRDCA11	Le Grande	Merced	178	-	43,320	0.00%
209185	LGRNCA12	LaGrande D Pedr	Stanislaus	859	-	47,257	0.00%
707301	LKBRCA11	Lake Berryessa	Napa	188	-	11,886	0.00%
661405	LKLACA11	Lake Los Angeles	Los Angeles	427	-	43,680	0.00%
707302	LKPTCA02	Lakeport	Lake	2039	-	190,486	0.00%
619751	LKSDCA12	Lakeside	San Diego	1795	-	172,614	0.00%
530471	LLTNCA11	Loyalton	Plumas	546	-	15,172	0.00%
916467	LNCLCA11	Lincoln	Placer	840	-	85,884	0.00%
661374	LNVCYA11	Leona Valley	Los Angeles	322	-	156,071	0.00%
209191	LODICA01	Lodi	San Joaquin	5596	-	265,687	0.00%
707303	LOLTCA11	Lolita	Humboldt	123	-	9,355	0.00%
916470	LOMSCA11	Loomis	Placer	1397	-	115,392	0.00%
310622	LOMTCA11	Lomita	Los Angeles	5732	-	177,012	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
415023	LRKSCA11	Larkspur Corte Me	Marin	3120	-	28,622	0.00%
213624	LSANCA02	Madison 02 MO	Los Angeles	7967	-	291,514	0.00%
213625	LSANCA03	Madison 03 MA	Los Angeles	5572	-	75,499	0.00%
323626	LSANCA05	LSAN Pleasant	Los Angeles	6868	5,382	232,270	2.32%
213627	LSANCA06	Union	Los Angeles	4504	-	182,016	0.00%
310628	LSANCA07	LSAN Airport	Los Angeles	7220	-	19,121	0.00%
323629	LSANCA08	LSAN Meirose	Los Angeles	11621	-	365,907	0.00%
213630	LSANCA09	Richmond	Los Angeles	6015	-	335,031	0.00%
323631	LSANCA10	LSAN Webster	Los Angeles	9845	-	283,033	0.00%
213632	LSANCA11	Rampart	Los Angeles	10841	-	413,279	0.00%
323633	LSANCA12	Normandy	Los Angeles	9451	-	645,411	0.00%
323634	LSANCA13	LSAN Plymouth	Los Angeles	5803	-	282,014	0.00%
323635	LSANCA14	LSAN Adams	Los Angeles	3816	17,409	218,231	7.98%
323636	LSANCA15	LSAN Axminster	Los Angeles	7990	-	337,619	0.00%
323638	LSANCA23	LSAN Capitol	Los Angeles	7035	-	207,342	0.00%
323640	LSANCA29	LSAN Sunset	Los Angeles	5382	-	191,126	0.00%
323641	LSANCA34	LSAN Angeles	Los Angeles	9593	-	374,465	0.00%
323642	LSANCA35	LSAN Montebello	Los Angeles	7620	-	261,864	0.00%
323643	LSANCA38	LSAN Republic	Los Angeles	6084	-	273,973	0.00%
323644	LSANCA56	LSAN Clinton	Los Angeles	6516	-	192,710	0.00%
650024	LSATCA11	Los Altos	Santa Clara	4386	45,785	236,071	19.39%
209193	LSBNCA12	Los Banos	Merced	2068	-	157,287	0.00%
530469	LMLCA11	Los Molinos	Tehama	355	21,947	46,593	47.10%
530466	LSTNCA11	Lewiston	Trinity	508	4,855	14,930	32.52%
661375	LTRKCA11	Little Rock	Los Angeles	969	-	326,765	0.00%
925025	LVMRCA11	Livermore	Alameda	6279	-	489,137	0.00%
530468	LVOKCA11	Live Oak	Sutter	672	-	31,160	0.00%
707304	LWLKCA11	Lower Lake	Lake	1965	27,689	308,029	8.99%
559194	MADRCA11	Madera Main	Madera	3987	21,845	685,245	3.19%
559243	MADRCA12	Madera Bonnadell	Madera	369	-	52,283	0.00%
831113	MARNCA11	Marina	Monterey	1358	-	21,687	0.00%
209199	MDSTCA02	Modesto Main	Stanislaus	11017	-	644,595	0.00%
209200	MDSTCA03	Modesto Kellogg S	Stanislaus	2635	-	196,478	0.00%
209201	MDSTCA04	Modesto Kingswor	Stanislaus	1201	-	43,279	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
209248	MDSTCA05	Modesto Tally	Stanislaus	634	-	17,275	0.00%
209249	MDSTCA52	Modesto Davis	Stanislaus	18	-	1,268	0.00%
707306	MDTWCA11	Middletown	Lake	874	-	172,164	0.00%
209202	MKHLCA12	Mokelumne Hill	Calaveras	183	-	14,871	0.00%
707307	MKVLCA11	McKinleyville	Humboldt	1103	9,736	46,892	20.76%
650026	MLBRCA11	Millbrae	San Mateo	2613	-	38,267	0.00%
408114	MLPSCA11	Milpitas	Santa Clara	5636	-	127,982	0.00%
415027	MLVYCA01	Mill Valley	Marin	3821	-	63,792	0.00%
707305	MNDCCA11	Mendocino	Mendocino	1560	-	155,033	0.00%
559195	MNDTCA11	Mendota	Fresno	448	-	76,929	0.00%
650028	MNPKCA11	Menlo Park	San Mateo	4016	-	175,028	0.00%
707309	MNRICA11	Monte Rio	Sonoma	518	-	96,663	0.00%
661376	MOJVCA01	Mojave	Kern	581	-	71,609	0.00%
925029	MORGCA12	Moraga	Contra Costa	1735	-	74,237	0.00%
805378	MRBACA11	Morro Bay	San Luis Obispo	993	-	86,371	0.00%
209196	MRCDCA01	Merced	Merced	5298	-	562,718	0.00%
530473	MRNDCA11	Meridan	Sutter	150	-	5,420	0.00%
707308	MRNDCA11	Miranda	Humboldt	286	-	37,236	0.00%
209203	MRPHCA11	Murphys	Calaveras	818	-	76,963	0.00%
805377	MRPKCA12	Moorpark	Ventura	2457	-	1,218,522	0.00%
925030	MRTZCA11	Martinez	Contra Costa	3554	-	285,317	0.00%
650031	MSBHCA11	Moss Beach	San Mateo	830	-	56,552	0.00%
949806	MSVJCAAT	Mission Viejo	Orange	1889	-	4,533	0.00%
530529	MTAGCA11	Montague	Siskiyou	534	-	8,569	0.00%
760753	MTPSCA11	Mountain Pass	San Bernardino	19	-	6,590	0.00%
831115	MTRYCA01	Monterey	Monterey	5760	-	172,928	0.00%
530474	MTSHCA12	Mount Shasta	Siskiyou	1180	-	39,449	0.00%
650032	MTVWCA11	Mountain View	Santa Clara	7929	-	111,521	0.00%
530472	MYVICA01	Marysville	Yuba	3543	-	229,635	0.00%
707310	NAPACA01	Napa	Napa	7620	-	444,116	0.00%
530477	NCLSCA12	Nicolaus	Sutter	98	-	26,112	0.00%
916478	NHLDCA11	Edgewood N High	Sacramento	4053	31,539	368,641	8.56%
661379	NHLLCA01	Newhall	Los Angeles	5371	-	634,278	0.00%
818646	NHWDCOA1	NHWD Lankershir	Los Angeles	6119	-	621,565	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
818647	NHWDCOA02	NHWD Magnolia	Los Angeles	12672	-	788,265	0.00%
707311	NICECA11	Nice	Lake	465	-	88,610	0.00%
415033	NICSCA11	Nicasio	Marin	250	-	11,117	0.00%
760855	NILDCA11	Niland Main	Imperial	83	-	14,460	0.00%
760856	NILDCA12	Ninland Bombay E	Imperial	98	-	16,814	0.00%
805380	NIPMCA11	Nipomo	San Luis Obispo	999	-	88,020	0.00%
818648	NORGCA11	Northridge	Los Angeles	10424	37,683	986,797	3.82%
916479	NSRCRA11	Wabash	Sacramento	7088	95,277	412,604	23.09%
916537	NSRCRA12	North Natomas	Sacramento	2047	-	72,922	0.00%
530480	NSJNCA11	North San Juan	Nevada	490	-	20,740	0.00%
619754	NTCYCA11	National City High	San Diego	1415	-	24,742	0.00%
530475	NVCYCA11	Nevada City	Nevada	3415	29,760	175,423	16.96%
916476	NWCSCA11	Newcastle	Placer	924	-	69,872	0.00%
209204	NWMNCA12	Newman	Stanislaus	549	-	37,512	0.00%
530481	NYUBCA11	North Yuba	Yuba	515	-	29,786	0.00%
707312	OCNCA11	Occidental	Sonoma	599	-	49,970	0.00%
760758	OCSDCA11	Oceanside Missior	San Diego	4352	14,021	330,986	4.24%
805382	OJAICA11	Ojai	Ventura	1639	-	307,558	0.00%
209205	OKDLCA11	Oakdale	Stanislaus	2070	-	173,368	0.00%
510036	OKLDCA03	Oakland Franklin	Alameda	12884	-	153,386	0.00%
510037	OKLDCA04	Oakland KelloggFru	Alameda	5109	-	477,445	0.00%
510038	OKLDCA11	Oakland 45th Olyr	Alameda	9172	-	88,471	0.00%
510039	OKLDCA12	Oakland Holly	Alameda	7805	-	389,792	0.00%
510040	OKLDCA13	Oakland Mountain	Alameda	4550	-	55,130	0.00%
925041	OKLYCA11	Oakley	Contra Costa	1105	-	26,657	0.00%
805381	OKVWCA11	Oakview	Ventura	620	-	73,441	0.00%
661383	OLDLCA11	Export Oildale	Kern	2977	-	1,019,218	0.00%
559206	ORCVCA11	Orange Cove	Fresno	399	-	81,348	0.00%
530483	ORLDCA11	Orland	Glenn	1400	-	91,937	0.00%
925042	ORNDCA11	Orinda	Contra Costa	1932	-	27,680	0.00%
714759	ORNGCA11	Orange Chapman	Orange	6854	-	441,253	0.00%
714760	ORNGCA13	Orange Olive	Orange	5138	-	378,453	0.00%
714761	ORNGCA14	Orange West	Orange	3181	-	92,757	0.00%
559207	ORSICA11	Orosi	Tulare	757	-	134,780	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
916482	ORVACA11	Orangevale	Sacramento	2287	39,700	90,970	43.64%
530484	ORVLA11	Oroville Main	Butte	3496	-	122,572	0.00%
530485	ORVLA12	Oroville East	Butte	1522	11,418	139,512	8.18%
619853	OTMSCA11	Otay Mesa	San Diego	986	-	26,841	0.00%
760764	PALACA11	Pauma Valley	San Diego	812	-	92,036	0.00%
858762	PCBHCA01	Garnet	San Diego	4157	-	284,411	0.00%
858763	PCBHCA11	Hornblend	San Diego	548	-	24,330	0.00%
650043	PCFCCA11	Pacifica	San Mateo	3023	-	49,646	0.00%
951765	PDLYCA11	Pedley	Riverside	2466	27,450	435,505	6.30%
805386	PIRUCA11	Piru	Ventura	145	-	15,616	0.00%
650045	PLALCA02	Palo Alto Main	Santa Clara	10518	-	120,501	0.00%
650046	PLALCA12	Palo Alto South	Santa Clara	4001	-	20,911	0.00%
714767	PLCNCA11	Placentia	Orange	5397	-	476,847	0.00%
661384	PLDLCA01	Palmdale	Los Angeles	4380	17,422	371,660	4.69%
661412	PLDLCA11	Palmdale East 47	Los Angeles	902	-	72,552	0.00%
916491	PLGVCA12	Pleasant Grove	Placer	160	-	20,645	0.00%
209212	PLMOCA11	Plymouth	Amador	1528	-	117,107	0.00%
209211	PLNDCA11	Planada	Merced	279	-	37,551	0.00%
925047	PLTNCA12	Pleasanton Main	Alameda	4045	-	207,817	0.00%
925083	PLTNCA13	Pleasanton Hacier	Alameda	1621	-	49,692	0.00%
530489	PLVLA11	Placerville Main	El Dorado	7102	78,185	445,092	17.57%
530490	PLVLA12	Placerville Niagara	El Dorado	2240	5,875	220,920	2.66%
707315	PNARCA11	Point Arena	Mendocino	597	26,725	83,477	32.01%
209209	PNCRCA11	Pinecrest	Tuolumne	921	-	60,972	0.00%
619766	PNVYCA11	Pine Valley	San Diego	247	-	25,547	0.00%
858768	POWYCA11	Poway Midland	San Diego	2729	-	76,457	0.00%
707313	PPWDCA11	Pepperwood	Humboldt	75	-	6,529	0.00%
530486	PRDSCA11	Paradise Main	Butte	1089	-	76,534	0.00%
530487	PRDSCA12	Paradise Pines	Butte	1026	-	93,950	0.00%
559208	PRLRCA11	Parlier	Fresno	469	-	31,750	0.00%
562649	PRMTCA01	Paramount	Los Angeles	4428	-	228,130	0.00%
415048	PRSNCA11	Point Reyes	Marin	825	-	17,794	0.00%
925049	PSBGCA01	Pittsburg Main	Contra Costa	2490	-	253,899	0.00%
925050	PSBGCA11	Pittsburg Bay Poin	Contra Costa	1095	-	48,373	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
805387	PSBHCA11	Pismo Beach	San Luis Obispo	736	-	54,019	0.00%
650051	PSCDCA11	Pescadero	San Mateo	565	-	43,093	0.00%
626650	PSDNCA11	Pasadena Mt Wils	Los Angeles	12284	-	222,373	0.00%
626651	PSDNCA12	Pasadena Lake	Los Angeles	5609	-	164,318	0.00%
530488	PSKNCA11	Paskenta	Tehama	101	-	2,639	0.00%
805385	PSRBCA01	Paso Robles	San Luis Obispo	4945	6,585	551,732	1.19%
707314	PTLMCA01	Petaluma	Sonoma	4990	-	227,253	0.00%
530492	PTOLCA01	Portola	Plumas	982	-	19,236	0.00%
559213	PTVLCA11	Porterville	Tulare	4993	12,698	215,603	5.89%
707316	PTVYCA11	Potter Valley	Mendocino	528	-	272,174	0.00%
559210	PXLYCA11	Pixley	Tulare	273	-	42,836	0.00%
530493	QNCYCA12	Quincy	Plumas	1838	-	132,862	0.00%
760769	RAMNCA11	Ramona	San Diego	1878	-	148,412	0.00%
858770	RBRNCA11	Rancho Bernardo	San Diego	4178	-	187,328	0.00%
916541	RCKLCA01	Stanford Ranch	Placer	3201	-	102,471	0.00%
916527	RCKLCA11	Rocklin	Placer	1244	-	55,233	0.00%
510052	RCMDCA11	Richmond SF	Contra Costa	7128	-	348,378	0.00%
530496	RCVACA11	Richvale	Butte	107	-	5,405	0.00%
530494	RDBLCA01	Red Bluff	Tehama	3745	123,883	121,506	101.96%
650053	RDCYCA01	Redwood City	San Mateo	7949	-	225,611	0.00%
530495	RDNGCA02	Redding Main	Shasta	4862	-	531,011	0.00%
530531	RDNGCA11	Redding Enterpr	Shasta	3279	18,119	70,508	25.70%
818652	RESDCA01	Reseda	Los Angeles	10038	19,900	602,866	3.30%
707317	RIDECA11	Rio Dell	Humboldt	238	18,122	32,097	56.46%
916526	RILNCA12	Rio Linda	Sacramento	1163	-	45,247	0.00%
909773	RILTCA11	Rialto	San Bernardino	3898	-	381,712	0.00%
916533	RNMRCGA11	Rancho Murietta	Sacramento	523	-	20,188	0.00%
858854	RNPSCA11	Rancho Penasquit	San Diego	1446	-	12,207	0.00%
619852	RNSDCA11	Rancho San Diegr	San Diego	814	-	23,052	0.00%
626654	ROSMCA11	Rosemead	Los Angeles	6423	-	163,405	0.00%
858771	RSFECA12	Rancho Santa Fe	San Diego	3255	-	98,303	0.00%
661388	RSMIDCA11	Rosamond	Kern	1123	-	94,721	0.00%
949808	RSMGCA11	R S Margarita	Orange	2003	-	28,744	0.00%
707337	RTPKCA11	Rohnert Park	Sonoma	2121	-	72,712	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
559215	RVDLCA11	Riverdale	Fresno	336	-	56,131	0.00%
209214	RVRBCA11	Riverbank	Stanislaus	992	-	23,589	0.00%
951774	RVSDCA01	Riverside Orange	Riverside	7926	8,685	477,823	1.82%
951775	RVSDCA11	Woodcrest	Riverside	2640	-	205,180	0.00%
661407	SAGSCA11	Saugus	Los Angeles	2528	-	245,186	0.00%
619795	SANTCA01	Santee	San Diego	2186	-	135,006	0.00%
805391	SATCCA12	Saticoy	Ventura	1946	5,363	121,595	4.41%
707321	SBSTCA11	Sebastapol	Sonoma	2794	32,610	351,030	9.29%
916497	SCRMCA01	Sacramento Mh	Sacramento	6182	-	75,992	0.00%
916498	SCRMCA02	SCRM Ivanhoe	Sacramento	7391	11,948	250,936	4.76%
916499	SCRMCA03	SCRM Garden	Sacramento	8642	31,091	487,675	6.38%
916500	SCRMCA11	SCRM Gladstone	Sacramento	6152	-	129,853	0.00%
916501	SCRMCA12	SCRM Empire	Sacramento	4226	-	156,697	0.00%
916502	SCRMCA13	SCRM Fruitridge	Sacramento	2983	62,711	127,645	49.13%
916497	SCRMCA1R	Sequoia Pacific St	Sacramento	6182	-	-	#DIV/0!
916538	SCRMCA1Z	P Street State	Sacramento	-	-	-	#DIV/0!
916539	SCRMCA1E	First Ave DMV Sta	Sacramento	-	-	-	#DIV/0!
831116	SCVYCA01	Scotts Valley	Santa Cruz	1367	-	25,197	0.00%
530508	SDSPCA11	Soda Springs	Nevada	527	-	79,397	0.00%
559217	SELMCA11	Selma	Fresno	1616	-	121,015	0.00%
831117	SESDCA11	Seaside	Monterey	1845	-	54,451	0.00%
323655	SGATCA01	South Gate	Los Angeles	4611	-	543,039	0.00%
530504	SGSPCA11	Shingle Springs	El Dorado	3431	34,518	268,615	12.85%
661392	SHFTCA11	Shafter	Kern	772	-	99,573	0.00%
530503	SHLKCA01	Shasta Lake	Shasta	342	-	101,712	0.00%
818656	SHOKCA01	Sherman Oaks	Los Angeles	13316	-	602,971	0.00%
760796	SHSHCA11	Shoshone	San Bernardino	137	-	9,499	0.00%
805393	SIMICA11	Simi	Ventura	7815	-	1,643,216	0.00%
949791	SJPCPA12	S J Capistrano	Orange	4048	-	35,832	0.00%
209220	SKTNCA01	Stockton Main	San Joaquin	7703	-	489,989	0.00%
209221	SKTNCA11	Stockton Granite	San Joaquin	7644	-	635,162	0.00%
209222	SKTNCA12	Stockton Ashley	San Joaquin	1196	-	134,528	0.00%
209223	SKTNCA14	Stockton Redwood	San Joaquin	1471	-	102,554	0.00%
831118	SLDDCA11	Soledad	Monterey	947	-	148,989	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
661394	SLMNCA11	Solemint	Los Angeles	3415	-	397,607	0.00%
831119	SLNSCA01	Salinas Main	Monterey	5792	-	110,870	0.00%
831120	SLNSCA11	Hickory Salinas	Monterey	2176	-	47,742	0.00%
831121	SLNSCA12	Glenview	Monterey	556	-	8,556	0.00%
831122	SLNSCA13	Hunter	Monterey	680	-	11,406	0.00%
831123	SLNSCA14	Moro	Monterey	1095	-	48,454	0.00%
714797	SLVRCA11	Silverado	Orange	191	-	54,216	0.00%
530507	SMAVCA11	Smartsville	Yuba	318	-	19,293	0.00%
209216	SNADCA11	San Andreas	Calaveras	1238	-	110,300	0.00%
714788	SNANCA01	Bush	Orange	8268	-	182,223	0.00%
714789	SNANCA11	Bristol	Orange	9617	73,863	264,596	27.92%
714804	SNANCA12	Santa Ana West S Orange	Orange	2806	16,598	74,071	22.41%
831124	SNARCA11	San Ardo	Monterey	119	-	25,111	0.00%
650055	SNBUCA02	San Bruno	San Mateo	9822	-	104,775	0.00%
949776	SNCLCA12	San Clemente	Orange	2602	-	22,980	0.00%
650056	SNCRCA11	San Carlos	San Mateo	6590	-	44,154	0.00%
831125	SNCZCA01	Santa Cruz	Santa Cruz	6297	-	112,232	0.00%
831126	SNCZCA11	Santa Cruz Capito Santa Cruz	Santa Cruz	4979	32,778	126,850	25.84%
619777	SNDGCA01	SNDG C Street	San Diego	5627	-	47,102	0.00%
619778	SNDGCA02	SNDG University	San Diego	5448	-	110,551	0.00%
858779	SNDGCA03	SNDG Linda Vista	San Diego	8083	-	330,520	0.00%
619780	SNDGCA05	SNDG Saipan	San Diego	2182	-	106,177	0.00%
619781	SNDGCA06	SNDG 37th Street	San Diego	3952	-	54,238	0.00%
619782	SNDGCA11	SNDG College	San Diego	2566	-	157,196	0.00%
619783	SNDGCA12	SNDG Market Stre	San Diego	2184	-	33,865	0.00%
619784	SNDGCA14	SNDG Tennyson	San Diego	2848	-	34,696	0.00%
858785	SNDGCA15	SNDG Regents	San Diego	6954	-	79,119	0.00%
858786	SNDGCA16	SNDG Mira Mesa	San Diego	5310	-	70,026	0.00%
415058	SNFCCA01	SF Bush Pine	San Francisco	14854	-	319,373	0.00%
415059	SNFCCA04	SF Market McCop	San Francisco	10962	5,814	499,757	1.16%
415060	SNFCCA05	SF Mission 25th S	San Francisco	10082	10,859	247,554	4.39%
415061	SNFCCA06	SF Juniper Onond	San Francisco	11364	67,367	293,567	22.95%
415067	SNFCCA12	SF Larkin Steiner	San Francisco	22366	-	450,909	0.00%
415064	SNFCCA13	SF Evergreen 9th	San Francisco	9186	-	191,019	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
415065	SNFCCA14	SF Montrose 19th	San Francisco	11765	-	232,590	0.00%
415066	SNFCCA17	SF Third St	San Mateo	4510	-	170,617	0.00%
415068	SNFCCA21	SF Folsom	San Francisco	7656	-	58,445	0.00%
415084	SNFCCA64	UC Hospital	San Francisco	-	-	1,167	0.00%
626658	SNGBCA01	San Gabriel	Los Angeles	4610	19,071	235,554	8.10%
415069	SNGNCA11	San Geronimo	Marin	461	-	28,570	0.00%
831127	SNJNCA11	San Juan Bautist	San Benito	384	-	7,077	0.00%
408128	SNJSCA02	San Jose Main	Santa Clara	12910	-	253,953	0.00%
408129	SNJSCA11	San Jose White R	Santa Clara	8051	21,239	312,421	6.80%
408130	SNJSCA12	San Jose Dial Way	Santa Clara	13069	36,755	282,004	13.03%
408131	SNJSCA13	San Jose Chynow	Santa Clara	7594	-	621,753	0.00%
408132	SNJSCA14	San Jose Foxwort	Santa Clara	9411	151,565	564,078	26.87%
408133	SNJSCA15	San Jose Evergre	Santa Clara	5113	-	360,280	0.00%
408134	SNJSCA18	San Jose Almader	Santa Clara	2877	-	202,967	0.00%
408145	SNJSCA21	San Jose Junction	Santa Clara	6140	-	44,129	0.00%
408142	SNJSCA22	San Jose Bailey	Santa Clara	149	-	25,850	0.00%
831135	SNLCCA11	San Lucas	Monterey	43	-	21,562	0.00%
510070	SNLNCA11	San Leandro	Alameda	8284	-	212,461	0.00%
805389	SNLOCA01	San Luis Obispo	San Luis Obispo	4352	-	575,015	0.00%
408136	SNMACA11	San Martin	Santa Clara	632	-	81,065	0.00%
760792	SNMCCA11	San Marcos	San Diego	4889	1,511	419,648	0.36%
805390	SNMICA11	Santa Margarita	San Luis Obispo	540	-	42,927	0.00%
650071	SNMTCA11	San Mateo	San Mateo	7900	-	178,254	0.00%
310659	SNPDCA01	San Pedro	Los Angeles	7437	-	403,536	0.00%
209218	SNRACA13	Sonora	Tuolumne	4857	-	412,432	0.00%
415072	SNRFAA01	San Rafael Main	Marin	6998	-	172,731	0.00%
415073	SNRFAA11	Parkway	Marin	2956	-	21,352	0.00%
925074	SNRMCA11	San Ramon	Alameda	4197	-	169,531	0.00%
707320	SNRSCA01	Santa Rosa Main	Sonoma	11549	-	734,403	0.00%
707319	SNRSCA11	Los Alamos	Sonoma	2537	-	91,433	0.00%
408143	SNTCCA01	Santa Clara Spac	Santa Clara	4768	-	86,502	0.00%
408137	SNTCCA11	Santa Clara Bellor	Santa Clara	8974	-	175,946	0.00%
408138	SNVACA01	Carrol Sunnyvale	Santa Clara	7759	6,195	147,584	4.20%
408139	SNVACA11	Mathilda Sunneyv	Santa Clara	1662	-	15,573	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
619794	SNYSKA12	San Ysidro	San Diego	1283	-	52,354	0.00%
707323	SONMCA12	Sonoma	Sonoma	3961	-	230,651	0.00%
626660	SPSDCA11	Sout Pasadena	Mi Los Angeles	2834	-	29,159	0.00%
559219	SPVLC A11	Springville	Tulare	751	-	44,138	0.00%
530505	SRCYCA11	Sierra City	Sierra	430	-	10,677	0.00%
559224	SRFRCA11	Stratford	Kings	85	-	14,407	0.00%
530506	SRVLC A11	Sierraville	Sierra	162	-	4,145	0.00%
415075	SSLTCA11	Sausalito Larkspur	Marin	1737	-	17,833	0.00%
530509	STAHCA01	South Tahoe Suss	El Dorado	2731	-	72,231	0.00%
530511	STAHCA12	South Tahoe Tam	El Dorado	128	-	6,042	0.00%
530512	STAHCA13	South Tahoe Meyr	El Dorado	785	-	26,229	0.00%
415076	STBHCA11	Stinson Beach	Marin	1202	-	33,640	0.00%
209225	STCKCA11	Sutter Creek	Amador	697	-	44,477	0.00%
530513	STFRCA11	Stonyford	Colusa	138	-	5,436	0.00%
707318	STHNCA11	St Helena	Napa	2372	-	99,871	0.00%
707324	SUISCA11	Suisun City	Solano	345	-	11,330	0.00%
925077	SUNLCA11	Sunol	Alameda	191	-	44,606	0.00%
415005	TBRNCA11	Tiburon	Marin	1686	-	3,569	0.00%
661395	THCHCA01	Techachapi	Kern	1787	-	184,186	0.00%
530514	THCYCA01	Tahoe City	Placer	2438	-	52,998	0.00%
559228	THRRCA11	Three Rivers	Tulare	609	59,250	99,547	59.52%
209227	THTNCA11	Thornton	San Joaquin	100	-	39,916	0.00%
707325	TMLSCA12	Tomales	Sonoma	287	-	27,618	0.00%
805396	TMTNCA11	Templeton	San Luis Obispo	643	-	49,354	0.00%
559229	TPTNCA11	Tipton	Tulare	199	-	32,856	0.00%
209230	TRACCA11	Tracy	San Joaquin	4319	-	390,405	0.00%
559226	TRBLCA11	Terra Bella	Tulare	417	-	70,772	0.00%
209232	TRLCCA11	Turlock	Stanislaus	6746	-	379,362	0.00%
310661	TRNCCA11	Torrance	Los Angeles	4260	-	220,986	0.00%
707326	TRNDCA11	Trinidad	Humboldt	296	-	27,229	0.00%
831140	TRPSCA11	Tres Pinos	San Benito	214	-	4,801	0.00%
530515	TRUCCA11	Truckee	Nevada	3351	-	117,401	0.00%
530516	TRUCCA12	North Star	Placer	606	-	7,483	0.00%
559231	TULRCA11	Tulare	Tulare	3875	-	367,230	0.00%

Table 7.17 GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$0.7
714798	TUSTCA11	Tustin 11	Orange	6962	-	134,751	0.00%
714805	TUSTCA70	Tustin 70	Orange	658	-	2,698	0.00%
209233	TWHRCA11	Twain Harte	Tuolumne	1607	-	122,275	0.00%
707328	UKIHCA01	Ukiah Main	Mendocino	3947	17,349	316,473	5.48%
707327	UKIHCA12	Capella Ivanhoe	Mendocino	995	-	97,224	0.00%
510078	UNCYCA11	Union City	Alameda	4821	-	300,413	0.00%
707329	UPLKCA11	Upper Lake	Lake	388	-	83,640	0.00%
707330	VCVLCA12	Vacaville	Solano	5328	-	471,817	0.00%
530517	VINACA12	Vina	Tehama	69	-	10,211	0.00%
559235	VISLCA11	Visalia Main	Tulare	6971	-	641,327	0.00%
760800	VISTCA12	Vista	San Diego	5720	-	393,191	0.00%
760799	VLCTCA11	Valley Center	San Diego	2286	-	157,356	0.00%
707331	VLLJCA01	Vallejo	Solano	6162	-	988,509	0.00%
818662	VNNYCA02	Van Nuys	Los Angeles	10196	15,266	529,734	2.88%
805400	VNTRCA02	Ventura Fir	Ventura	2365	-	163,802	0.00%
805399	VNTRCA11	Ventura Main	Mon Ventura	4798	6,318	295,151	2.14%
707332	VYFRCA11	Valley Ford	Sonoma	184	-	32,423	0.00%
209234	VYSPCA11	Valley Springs	Calaveras	1100	14,574	92,954	15.68%
209238	WANACA11	Wawana	Mariposa	267	-	13,352	0.00%
661402	WASCCA01	Wasco	Kern	774	20,085	66,272	30.31%
530523	WDLDC A11	Woodland	Yolo	4358	-	181,131	0.00%
559239	WDLKCA11	Woodlake	Tulare	533	-	130,178	0.00%
530518	WEEDCA01	Weed	Siskiyou	847	-	13,016	0.00%
707333	WEOTCA11	Weott	Humboldt	63	-	20,157	0.00%
310663	WLANCA01	Century City	Los Angeles	5791	-	55,368	0.00%
661401	WLBSCA11	Walker Basin	Kern	447	-	61,856	0.00%
209236	WLLCCA11	Wallace	Calaveras	400	23,151	44,903	51.56%
310664	WLMGCA01	Wilmington	Los Angeles	5429	7,678	370,114	2.07%
707334	WLTSCA12	Willits	Mendocino	2049	-	302,155	0.00%
530521	WLWSCA11	Willows	Glenn	989	-	53,383	0.00%
925079	WNCKCA11	Walnut Creek	Contra Costa	11153	22,950	506,532	4.53%
707335	WNSDCA11	Windsor	Sonoma	1693	-	134,483	0.00%
760801	WNSPCA12	Warner Springs	San Diego	373	-	37,095	0.00%
530522	WNTRCA11	Winters	Yolo	734	16,119	63,060	25.56%

Table 7.17 GO 133-D §9.7 "ALTERNATIVE INVESTMENTS" vs. REHAB EXPENDITURES (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D §9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D §0.7
916519	WSCRCA11	Frontier	Sacramento	3690	-	164,566	0.00%
209237	WTFRCA11	Waterford	Stanislaus	758	-	108,950	0.00%
530520	WTLDCA12	Wheatland	Sutter	497	-	37,759	0.00%
831141	WTVLCA01	Watsonville	Santa Cruz	7582	48,755	199,766	24.41%
530525	YBCYCA01	Yuba City Marysvi	Sutter	4625	-	130,340	0.00%
707336	YNVLCA11	Yountville	Napa	819	-	27,544	0.00%
530524	YREKCA11	Yreka	Siskiyou	1314	-	13,848	0.00%
714802	YRLNCA11	Yorba Linda	Orange	3299	-	348,775	0.00%
714809	YRLNCA12	Gypsum Canyon	Orange	562	-	34,901	0.00%
209240	YSMTCA11	Yosemite Main	Mariposa	529	-	79,884	0.00%
209241	YSMTCA12	El Portal	Mariposa	299	-	44,657	0.00%
TOTALS 2018-2019				1,915,900	2,725,499	107,211,728	2.54%

Table 7.18

AT&T CALIFORNIA

COMPARISON OF GO 133-D \$9.7 "ALTERNATIVE PROPOSED INVESTMENTS" AND TOTAL 2018-2019 REHAB EXPENDITURES
(Sorted by Other Rehab Expenditures -- Largest to Smallest)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
661359	BKFCA14	Bakersfield Temple	Kern	6693	-	1,678,481	0.00%
805393	SIMICA11	Simi	Ventura	7815	-	1,643,216	0.00%
818610	CNPKCA01	Canoga Park	Los Angeles	13344	16,043	1,356,631	1.18%
661357	BKFCA12	Bakersfield Main Fairview	Kern	6158	-	1,338,241	0.00%
310615	GRDNCA01	Gardena	Los Angeles	11967	-	1,293,390	0.00%
805377	MRPKCA12	Moortpark	Ventura	2457	-	1,218,522	0.00%
310609	CMTNCA01	Compton	Los Angeles	9969	51,395	1,171,795	4.39%
661383	OLDLCA11	Export Oildale	Kern	2977	-	1,019,218	0.00%
951721	CORNCA11	Corona	Riverside	10738	12,733	1,015,536	1.25%
707331	VLLJCA01	Vallejo	Solano	6162	-	988,509	0.00%
760733	ESCNCA01	Esccondido	San Diego	7483	-	988,311	0.00%
818648	NORGCA11	Northridge	Los Angeles	10424	37,683	986,797	3.82%
818600	AGORCA11	Agoura	Los Angeles	4858	-	951,226	0.00%
559159	CLVSCA11	Clovis	Fresno	8311	19,168	881,838	2.17%
909736	FNTACA11	Fontana	San Bernardino	5840	-	829,593	0.00%
818647	NHWDA02	NHWD Magnolia	Los Angeles	12672	-	788,265	0.00%
559168	FRSNCA01	Fresno Main	Fresno	7618	8,285	783,227	1.06%
707320	SNRSCA01	Santa Rosa Main	Sonoma	11549	-	734,403	0.00%
714702	ANHMCA11	Anaheim Cypress	Orange	7686	-	719,465	0.00%
559194	MADRCA11	Madera Main	Madera	3987	21,845	685,245	3.19%
818605	BRBNCA11	Burbank Palm	Los Angeles	9868	-	671,797	0.00%
323633	LSANCA12	Normandy	Los Angeles	9451	-	645,411	0.00%
818614	GLDLCA11	Glendale	Los Angeles	14660	-	644,655	0.00%
209199	MDSTCA02	Modesto Main	Stanislaus	11017	-	644,595	0.00%
559170	FRSNCA13	Fresno Sierra	Fresno	6388	-	641,601	0.00%
559235	VISLCA11	Visalia Main	Tulare	6971	-	641,327	0.00%

Table 7.18 GO 133-D §9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D §9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D §9.7
209221	SKTNCA11	Stockton Granite	San Joaquin	7644	-	635,162	0.00%
661379	NHLLCA01	Newhall	Los Angeles	5371	-	634,278	0.00%
408131	SNJSCA13	San Jose Chynoweth	Santa Clara	7594	-	621,753	0.00%
818646	NHWDA01	NHWD Lankershim	Los Angeles	6119	-	621,565	0.00%
818656	SHOKCA01	Sherman Oaks	Los Angeles	13316	-	602,971	0.00%
818652	RESDA01	Reseda	Los Angeles	10038	19,900	602,866	3.30%
805389	SNLOCA01	San Luis Obispo	San Luis Obispo	4352	-	575,015	0.00%
707292	FTBRCA02	Fort Bragg	Mendocino	3227	49,006	571,959	8.57%
408132	SNJSCA14	San Jose Foxworthy	Santa Clara	9411	151,565	564,078	26.87%
209196	MRCDA01	Merced	Merced	5298	-	562,718	0.00%
714737	FUTNCA01	Fullerton	Orange	8005	-	559,318	0.00%
805385	PSRBCA01	Paso Robles	San Luis Obispo	4945	6,585	551,732	1.19%
323655	SGATCA01	South Gate	Los Angeles	4611	-	543,039	0.00%
530495	RDNGCA02	Redding Main	Shasta	4862	-	531,011	0.00%
323616	HLWDA01	Hollywood	Los Angeles	9481	-	530,927	0.00%
818662	VNNYCA02	Van Nuys	Los Angeles	10196	15,266	529,734	2.88%
925079	WNCKCA11	Walnut Creek	Los Angeles	11153	22,950	506,532	4.53%
661356	BKFDCA11	Bakersfield Empire	Contra Costa	1142	-	501,216	0.00%
415059	SNFCCA04	SF Market McCoppin	Kern	10962	5,814	499,757	1.16%
209220	SKTNCA01	Stockton Main	San Francisco	7703	-	489,989	0.00%
925025	LVMRCA11	Livermore	San Joaquin	6279	-	489,137	0.00%
916499	SCRMCA03	SCRm Garden	Alameda	8642	31,091	487,675	6.38%
951774	RVSDCA01	Riverside Orange	Sacramento	7926	8,685	477,823	1.82%
510037	OKLDA04	Oakland KellogFruitvale	Riverside	5109	-	477,445	0.00%
951704	ARTNCA11	Arlington	Alameda	5896	-	477,090	0.00%
714767	PLCNCA11	Placentia	Riverside	5397	-	476,847	0.00%
707330	VCVLCA12	Vacaville	Orange	5328	-	471,817	0.00%
510014	FRMTCA11	Fremont Main 11	Solano	7958	-	461,388	0.00%
415067	SNFCCA12	SF Larkin Steiner	Alameda	22366	-	450,909	0.00%
530489	PLVLCA11	Placerville Main	San Francisco	7102	78,185	445,092	17.57%
707310	NAPACA01	Napa	EI Dorado	7620	-	444,116	0.00%
714759	ORNGCA11	Orange Chapman	Napa	6854	-	441,253	0.00%
661358	BKFDCA13	Bakersfield Columbus	Orange	2365	-	439,850	0.00%
951765	PDLYCA11	Pedley	Kern	2466	27,450	435,505	6.30%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
760792	SNMCCA11	San Marcos	San Diego	4889	1,511	419,648	0.36%
213632	LSANCA11	Rampart	Los Angeles	10841	-	413,279	0.00%
916479	NSCRCA11	Wabash	Sacramento	7088	95,277	412,604	23.09%
209218	SNRACA13	Sonora	Tuolumne	4857	-	412,432	0.00%
323617	HNPKA01	Huntington Park	Los Angeles	6751	-	406,759	0.00%
831105	CRMLCA11	Carmel Main	Monterey	4592	4,577	406,060	1.13%
310659	SNPDCA01	San Pedro	Los Angeles	7437	-	403,536	0.00%
818621	LACRCA11	La Crescenta	Los Angeles	6224	-	402,615	0.00%
661394	SLMNCA11	Solemint	Los Angeles	3415	-	397,607	0.00%
760800	VISTCA12	Vista	San Diego	5720	-	393,191	0.00%
209230	TRACCA11	Tracy	San Joaquin	4319	-	390,405	0.00%
510039	OKLDCA12	Oakland Holly	Alameda	7805	-	389,792	0.00%
805352	ARGRCA12	Arroyo Grande	San Luis Obispo	3827	-	389,592	0.00%
925003	ANTCCA11	Antioch	Contra Costa	5049	-	383,040	0.00%
909773	RILTCA11	Rialto	San Bernardino	3898	-	381,712	0.00%
559175	HNFRA01	Hanford	Kings	3748	-	381,264	0.00%
209232	TRLCCA11	Turlock	Stanislaus	6746	-	379,362	0.00%
714760	ORNGCA13	Orange Olive	Orange	5138	-	378,453	0.00%
323641	LSANCA34	LSAN Angeles	Los Angeles	9593	8,133	374,465	0.00%
661384	PLDLCA01	Palmdale	Los Angeles	4380	17,422	371,660	2.17%
310664	WLMGCA01	Wilmington	Los Angeles	5429	7,678	370,114	2.07%
916478	NHLDCA11	Edgewood N Highl	Sacramento	4053	31,539	368,641	8.56%
559231	TULRCA11	Tulare	Tulare	3875	-	367,230	0.00%
323629	LSANCA08	LSAN Melrose	Los Angeles	11621	-	365,907	0.00%
916451	FROKCA11	Fair Oaks	Sacramento	7463	56,582	362,215	15.62%
408133	SNJSCA15	San Jose Evergreen	Santa Clara	5113	-	360,280	0.00%
760735	FLBKCA12	Fallbrook	San Diego	3475	-	356,664	0.00%
707321	SBSTCA11	Sebastapol	Sonoma	2794	32,610	351,030	9.29%
714802	YRLNCA11	Yorba Linda	Orange	3299	-	348,775	0.00%
510052	RCMDCA11	Richmond SF	Contra Costa	7128	-	348,378	0.00%
707290	FRFDCA01	Fairfield	Solano	5082	32,398	345,379	9.38%
714710	BNPKCA11	Buena Park	Orange	4388	-	340,621	0.00%
619752	LAMSCA01	La Mesa	San Diego	5791	29,460	338,207	8.71%
323636	LSANCA15	LSAN Axminster	Los Angeles	7990	-	337,619	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
559245	FRSNCA14	Fresno West Highway City	Fresno	3283	80,144	335,224	23.91%
213630	LSANCA09	Richmond	Los Angeles	6015	-	335,031	0.00%
925009	CNCRCA01	Concord	Contra Costa	8980	-	332,450	0.00%
760758	OCSDCA11	Oceanside Mission	San Diego	4352	14,021	330,986	4.24%
858779	SNDGCA03	SNDG Linda Vista	San Diego	8083	-	330,520	0.00%
661375	LTRKCA11	Little Rock	Los Angeles	969	-	326,765	0.00%
619729	ELCJCA11	El Cajon	San Diego	4004	4,702	326,642	1.44%
714709	BREACA12	Brea	Orange	2998	-	326,264	0.00%
714701	ANHMCA01	Anaheim Lemon	Orange	7849	-	321,767	0.00%
310607	BVHLCA01	Beverly Hills	Los Angeles	16372	-	320,349	0.00%
415058	SNFCCA01	SF Bush Pine	San Francisco	14854	-	319,373	0.00%
707328	UKIHCA01	Ukiah Main	Mendocino	3947	17,349	316,473	5.48%
408129	SNJSCA11	San Jose White Rd	Santa Clara	8051	21,239	312,421	6.80%
661351	AGDLCA11	Agua Dulce	Los Angeles	456	-	311,170	0.00%
707304	LWLKCA11	Lower Lake	Lake	1965	27,689	308,029	8.99%
661361	BKFDCA17	Bakersfield West Rosedale	Kern	3311	-	307,839	0.00%
805382	OJAICA11	Ojai	Ventura	1639	-	307,558	0.00%
909720	COTNCA11	Colton	San Bernardino	3205	-	304,731	0.00%
925012	DAVLCA12	Danville Main 12	Contra Costa	5110	-	303,232	0.00%
707334	WLTSCA12	Willits	Mendocino	2049	-	302,155	0.00%
818666	CLBSCA11	Calabasas Park Sorrento	Los Angeles	3840	-	300,793	0.00%
510078	UNCYCA11	Union City	Alameda	4821	-	300,413	0.00%
805399	VNTRCA11	Ventura Main Montalvo	Ventura	4798	6,318	295,151	2.14%
415061	SNFCCA06	SF Juniper Onondaga	San Francisco	11364	67,367	293,567	22.95%
213624	LSANCA02	Madison 02 MO	Los Angeles	7967	-	291,514	0.00%
530438	CHICCA01	Chico Main	Butte	10221	6,955	287,579	2.42%
925030	MRTZCA11	Martinez	Contra Costa	3554	-	285,317	0.00%
530459	GRVYCA01	Grass Valley	Nevada	7879	28,787	284,966	10.10%
858762	PCBHCA01	Garnet	San Diego	4157	-	284,411	0.00%
323631	LSANCA10	LSAN Webster	Los Angeles	9845	-	283,033	0.00%
323634	LSANCA13	LSAN Plymouth	Los Angeles	5803	-	282,014	0.00%
408130	SNJSCA12	San Jose Dial Way	Santa Clara	13069	36,755	282,004	13.03%
310608	CLCYCA11	Culver City	Los Angeles	7964	-	277,935	0.00%
559169	FRSNCA11	Fresno Baldwin	Fresno	5377	-	275,888	0.00%

Table 7.18 GO 133-D §9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D §9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D §9.7
323643	LSANCA38	LSAN Republic	Los Angeles	6084	-	273,973	0.00%
559172	FRSNCA12	Fresno Clinton	Fresno	4088	-	273,821	0.00%
707316	PTVYCA11	Potter Valley	Mendocino	528	-	272,174	0.00%
530504	SGSPCA11	Shingle Springs	El Dorado	3431	34,518	268,615	12.85%
209191	LODICA01	Lodi	San Joaquin	5596	-	265,687	0.00%
714789	SNANCA11	Bristol	Orange	9617	73,863	264,596	27.92%
323642	LSANCA35	LSAN Montebello	Los Angeles	7620	-	261,864	0.00%
909741	HGLDCA11	Highland	San Bernardino	2208	-	260,788	0.00%
510015	FRMTCA12	Fremont Adams Oliver 12	Alameda	6839	-	260,114	0.00%
626611	ELMNCA01	El Monte	Los Angeles	9210	7,436	260,083	2.86%
209153	ATWRCA12	Atwater	Merced	1837	-	257,259	0.00%
661371	FZPKCA11	Frazier Park	Kern	757	-	255,429	0.00%
408128	SNJSCA02	San Jose Main	Santa Clara	12910	-	253,953	0.00%
925049	PSBGCA01	Pittsburg Main	Contra Costa	2490	-	253,899	0.00%
916498	SCRMCA02	SCRM Ivanhoe	Sacramento	7391	11,948	250,936	4.76%
415060	SNFCCA05	SF Mission 25th St	San Francisco	10082	10,859	247,554	4.39%
661407	SAGSCA11	Saugus	Los Angeles	2528	-	245,186	0.00%
650024	LSATCA11	Los Altos	Santa Clara	4386	45,785	236,071	19.39%
626658	SNGBCA01	San Gabriel	Los Angeles	4610	19,071	235,554	8.10%
760732	ENCTCA12	Encinitas	San Diego	4571	-	234,551	0.00%
626601	ALHBCA01	Alhambra	Los Angeles	8889	-	232,806	0.00%
415065	SNFCCA14	SF Montrose 19th	San Francisco	11765	-	232,590	0.00%
323626	LSANCA05	LSAN Pleasant	Los Angeles	6868	5,382	232,270	2.32%
707323	SONMCA12	Sonoma	Sonoma	3961	-	230,651	0.00%
661367	DELNCA11	Delano	Tulare	1939	48,637	230,364	21.11%
530472	MYVICA01	Marysville	Yuba	3543	-	229,635	0.00%
562649	PRMTCA01	Paramount	Los Angeles	4428	-	228,130	0.00%
707314	PTLMCA01	Petaluma	Sonoma	4990	-	227,253	0.00%
650053	RDCYCA01	Redwood City	San Mateo	7949	-	225,611	0.00%
626650	PSDNCA11	Pasadena Mt Wilson Green	Los Angeles	12284	-	222,373	0.00%
310661	TRNCCA11	Torrance	Los Angeles	4260	-	220,986	0.00%
530490	PLVLC A12	Placerville Niagara	El Dorado	2240	5,875	220,920	2.66%
323635	LSANCA14	LSAN Adams	Los Angeles	3816	17,409	218,231	7.98%
559213	PTVLC A11	Porterville	Tulare	4993	12,698	215,603	5.89%

Table 7.18 GO 133-D §9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D §9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D §9.7
323604	BELCA11	Bell	Los Angeles	2449	-	214,911	0.00%
831112	KGCYCA11	King City	Monterey	1327	-	212,905	0.00%
510070	SNLNCA11	San Leandro	Alameda	8284	-	212,461	0.00%
925047	PLTNCA12	Pleasanton Main Hopyard	Alameda	4045	-	207,817	0.00%
323638	LSANCA23	LSAN Capitol	Los Angeles	7035	-	207,342	0.00%
209173	GVLDCA11	Groveland	Tuolumne	1863	-	205,768	0.00%
951775	RVSDCA11	Woodcrest	Riverside	2640	-	205,180	0.00%
408134	SNJSCA18	San Jose Almaden Valley	Santa Clara	2877	-	202,967	0.00%
661408	CSTCCA11	Castaic	Los Angeles	3431	-	201,094	0.00%
831141	WTVLCA01	Watsonville	Santa Cruz	7582	48,755	199,766	24.41%
209151	ARNLCA11	Arnold	Calaveras	1936	-	197,594	0.00%
209200	MDSTCA03	Modesto Kellog South Ceres	Stanislaus	2635	-	196,478	0.00%
714703	ANHMCA12	Anaheim La Palma	Orange	1791	-	194,078	0.00%
559180	IVNHCA11	Ivanhoe	Tulare	441	-	193,296	0.00%
323644	LSANCA56	LSAN Clinton	Los Angeles	6516	-	192,710	0.00%
323640	LSANCA29	LSAN Sunset	Los Angeles	5382	-	191,126	0.00%
415064	SNFCCA13	SF Evergreen 9th Ave	San Francisco	9186	-	191,019	0.00%
707302	LKPTCA02	Lakeport	Lake	2039	-	190,486	0.00%
858770	RBRNCA11	Rancho Bernardo	San Diego	4178	-	187,328	0.00%
510002	ALMDCA11	Alameda Central	Alameda	6355	5,120	185,433	2.76%
831109	GNFDCA11	Green Field	Monterey	940	-	185,052	0.00%
707277	BNCICA11	Benicia	Solano	1943	-	185,031	0.00%
661395	THCHCA01	Techachapi	Kern	1787	-	184,186	0.00%
714788	SNANCA01	Bush	Orange	8268	-	182,223	0.00%
213627	LSANCA06	Union	Los Angeles	4504	-	182,016	0.00%
530523	WDLDCA11	Woodland	Yolo	4358	-	181,131	0.00%
949725	CSMSCA11	Costa Mesa	Orange	5737	-	178,369	0.00%
650071	SNMTCA11	San Mateo	San Mateo	7900	-	178,254	0.00%
310622	LOMTCA11	Lomita	Los Angeles	5732	-	177,012	0.00%
408137	SNTCCA11	Santa Clara Bellomy	Santa Clara	8974	-	175,946	0.00%
530475	NVCYCA11	Nevada City	Nevada	3415	29,760	175,423	16.96%
650028	MNPKCA11	Menlo Park	San Mateo	4016	-	175,028	0.00%
209205	OKDLCA11	Oakdale	Stanislaus	2070	-	173,368	0.00%
831115	MTRYCA01	Monterey	Monterey	5760	-	172,928	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
415072	SNRFA01	San Rafael Main	Marin	6998	-	172,731	0.00%
619751	LKSDCA12	Lakeside	San Diego	1795	-	172,614	0.00%
530428	AUBNCA01	Auburn Main	Placer	5789	-	172,598	0.00%
707306	MDTWCA11	Middletown	Lake	874	-	172,164	0.00%
916454	FLSMCA13	Folsom El Dorado Hills	Sacramento	2631	-	172,078	0.00%
805364	CMBACA11	Cambria	San Luis Obispo	1435	-	170,952	0.00%
415066	SNFCCA17	SF Third St	San Mateo	4510	-	170,617	0.00%
925074	SNRMCA11	San Ramon	Alameda	4197	-	169,531	0.00%
805354	ATSCCA11	Atascadero	San Luis Obispo	2312	-	169,359	0.00%
626602	ARCDCA11	Arcadia	Los Angeles	4800	-	168,770	0.00%
559158	CHWCCA11	Chowchilla	Madera	963	-	166,189	0.00%
619718	CHVSCA11	Chula Vista Third Avenue	San Diego	3894	8,957	165,333	5.42%
916519	WSCRA11	Frontier	Sacramento	3690	-	164,566	0.00%
626651	PSDNCA12	Pasadena Lake	Los Angeles	5609	-	164,318	0.00%
805400	VNTRCA02	Ventura Fir	Ventura	2365	-	163,802	0.00%
626654	ROSMCA11	Rosemead	Los Angeles	6423	-	163,405	0.00%
707297	HLBGCA11	Healdsburg	Sonoma	2672	16,075	162,508	9.89%
949731	ELTRCA11	El Toro	Orange	10967	14,400	161,360	8.92%
650010	COLACA01	Colma Daly City	San Mateo	5878	39,715	159,553	24.89%
760799	VLCTCA11	Valley Center	San Diego	2286	-	157,356	0.00%
209193	LSBNCA12	Los Banos	Merced	2068	-	157,287	0.00%
619782	SNDGCA11	SNDG College	San Diego	2566	-	157,196	0.00%
916501	SCRMCA12	SCRM Empire	Sacramento	4226	-	156,697	0.00%
559188	LEMCA11	Lemore Main	Kings	1200	15,802	156,276	10.11%
661374	LNVCYA11	Leona Valley	Los Angeles	322	-	156,071	0.00%
760730	ELCNCA01	El Centro	Imperial	3848	2,151	156,017	1.38%
707305	MNDCCA11	Mendocino	Mendocino	1560	-	155,033	0.00%
510036	OKLDCA03	Oakland Franklin	Alameda	12884	-	153,386	0.00%
805362	BYPKCA11	Baywood Park	San Luis Obispo	920	-	151,562	0.00%
510013	ELSBCA11	Rich Appian Way El Sobrante	Contra Costa	3219	-	150,753	0.00%
831118	SLDDCA11	Soledad	Monterey	947	-	148,989	0.00%
760769	RAMNCA11	Ramona	San Diego	1878	-	148,412	0.00%
408138	SNVACA01	Carrol Sunnyvale	Santa Clara	7759	6,195	147,584	4.20%
707291	FSVLCA11	Forestville	Sonoma	737	-	147,241	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
707282	CLSTCA11	Callistoga	Napa	1111	-	146,784	0.00%
661353	ARVNCA11	Arvin	Kern	736	-	146,034	0.00%
530442	DAVSCA11	Davis	Yolo	4191	-	143,752	0.00%
510018	HYWRCA11	Hayward Depot	Alameda	5286	-	143,013	0.00%
530485	ORVLA12	Oroville East	Butte	1522	11,418	139,512	8.18%
619795	SANTCA01	Santee	San Diego	2186	-	135,006	0.00%
559207	ORSICA11	Orosi	Tulare	757	-	134,780	0.00%
714798	TUSTCA11	Tustin 11	Orange	6962	-	134,751	0.00%
209222	SKTNCA12	Stockton Ashley	San Joaquin	1196	-	134,528	0.00%
707335	WNSCA11	Windsor	Sonoma	1693	-	134,483	0.00%
949722	CRDMCA11	Corona Del Mar	Orange	6350	-	132,880	0.00%
530493	QNCYCA12	Quincy	Plumas	1838	-	132,862	0.00%
707284	CODLCA11	Cloverdale	Sonoma	832	-	130,963	0.00%
530525	YBCYCA01	Yuba City Marysville	Sutter	4625	-	130,340	0.00%
559239	WDLKCA11	Woodlake	Tulare	533	-	130,178	0.00%
925007	BRWDCA12	Brentwood	Contra Costa	3696	-	129,956	0.00%
916500	SCRMCA11	SCRM Gladstone	Sacramento	6152	-	129,853	0.00%
559160	CLNGCA01	Coalinga	Fresno	817	-	128,060	0.00%
408114	MLPSCA11	Milpitas	Santa Clara	5636	-	127,982	0.00%
916502	SCRMCA13	SCRM Fruitridge	Sacramento	2983	62,711	127,645	49.13%
707289	EURKCA01	Eureka	Humboldt	4799	-	127,638	0.00%
831126	SNCZCA11	Santa Cruz Capitola	Santa Cruz	4979	32,778	126,850	25.84%
510017	HYWRCA01	Hayward Main	Alameda	7870	-	125,529	0.00%
661409	BKFDCA19	Bakersfield Nomad	Kern	1972	-	123,092	0.00%
661410	ACTNCA11	Acton	Los Angeles	743	-	122,841	0.00%
530484	ORVLA11	Oroville Main	Butte	3496	-	122,572	0.00%
949745	IRVNCA01	Irvine	Orange	4684	-	122,428	0.00%
209233	TWHRCA11	Twain Harte	Tuolumne	1607	-	122,275	0.00%
831101	BGSRCA11	Big Sur	Monterey	389	-	122,197	0.00%
805391	SATCCA12	Saticoy	Ventura	1946	5,363	121,595	4.41%
530494	RDBLCA01	Red Bluff	Tehama	3745	123,883	121,506	101.96%
707280	BNVLA11	Boonville	Mendocino	645	12,118	121,299	9.99%
559217	SELMCA11	Selma	Fresno	1616	-	121,015	0.00%
650045	PLALCA02	Palo Alto Main	Santa Clara	10518	-	120,501	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
619700	ALPICA12	Alpine	San Diego	1624	47,280	118,847	39.78%
530515	TRUCCA11	Truckee	Nevada	3351	-	117,401	0.00%
209212	PLMOCA11	Plymouth	Amador	1528	-	117,107	0.00%
530441	CTWDCA11	Cottonwood	Tehama	2138	45,885	116,846	39.27%
916470	LOMSCA11	Loomis	Placer	1397	-	115,392	0.00%
916453	FLSMCA12	Folsom Nimbus	Sacramento	1844	26,554	114,499	23.19%
831125	SNCZCA01	Santa Cruz	Santa Cruz	6297	-	112,232	0.00%
209179	IONECA11	Ione	Amador	874	-	112,159	0.00%
650032	MTVWCA11	Mountain View	Santa Clara	7929	-	111,521	0.00%
831119	SLNSCA01	Salinas Main	Monterey	5792	-	110,870	0.00%
707443	DIXNCA11	Dixon	Solano	1345	-	110,688	0.00%
619778	SNDGCA02	SNDG University	San Diego	5448	-	110,551	0.00%
209216	SNADCA11	San Andreas	Calaveras	1238	-	110,300	0.00%
209237	WTFRCA11	Waterford	Stanislaus	758	-	108,950	0.00%
760708	BRWLCA11	Brawley	Imperial	1759	-	108,509	0.00%
831102	BLCKCA11	Boulder Creek	Santa Cruz	1051	51,244	106,508	48.11%
760748	JULNCA12	Julian	San Diego	879	-	106,381	0.00%
619780	SNDGCA05	SNDG Saipan	San Diego	2182	-	106,177	0.00%
650006	BRLNCA01	Burlingame	San Mateo	7936	72,737	106,149	68.52%
707300	KLVCA12	Kelseyville	Lake	1095	-	106,107	0.00%
650055	SNBUCA02	San Bruno	San Mateo	9822	-	104,775	0.00%
661372	LAMTCA11	Lamont	Kern	719	-	103,911	0.00%
209223	SKTNCA14	Stockton Redwood	San Joaquin	1471	-	102,554	0.00%
916541	RCKLCA01	Stanford Ranch	Placer	3201	-	102,471	0.00%
209181	JCSNCA01	Jackson	Amador	1451	-	102,215	0.00%
530503	SHLKCA01	Shasta Lake	Shasta	342	-	101,712	0.00%
209150	ANCMCA01	Angels Camp	Calaveras	809	-	100,528	0.00%
530457	GRTWCA11	Georgetown	El Dorado	1339	40,908	100,410	40.74%
707318	STHNCA11	St Helena	Napa	2372	-	99,871	0.00%
619744	IMBHCA11	Imperial Beach	San Diego	2049	12,190	99,724	12.22%
661392	SHFTCA11	Shafter	Kern	772	-	99,573	0.00%
559228	THRRCA11	Thre Rivers	Tulare	609	59,250	99,547	59.52%
510004	BKLYCA01	Berkeley Bancroft	Alameda	8600	-	98,859	0.00%
858771	RSFECA12	Rancho Santa Fe	San Diego	3255	-	98,303	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
760716	CRLSCA11	Carlsbad Harding	San Diego	2206	-	98,008	0.00%
707327	UKIHCA12	Capella Ivanhoe	Mendocino	995	-	97,224	0.00%
707295	GULLCA11	Gualala	Mendocino	1066	-	96,671	0.00%
707309	MNRICA11	Monte Rio	Sonoma	518	-	96,663	0.00%
209171	GALUCA11	Galt	Sacramento	1448	-	95,444	0.00%
661388	RSMDCA11	Rosamond	Kern	1123	-	94,721	0.00%
530487	PRDSCA12	Paradise Pines	Butte	1026	-	93,950	0.00%
209234	VYSPCA11	Valley Springs	Calaveras	1100	14,574	92,954	15.68%
714761	ORNGCA14	Orange West	Orange	3181	-	92,757	0.00%
510001	ALBYCA11	Albany Solano	Alameda	6236	21,550	92,458	23.31%
760764	PALACA11	Pauma Valley	San Diego	812	-	92,036	0.00%
530483	ORLDCA11	Orland	Glenn	1400	-	91,937	0.00%
707319	SNRSCA11	Los Alamos	Sonoma	2537	-	91,433	0.00%
650016	HMBACA12	Half Moon Bay	San Mateo	2349	37,312	91,019	40.99%
916482	ORVACA11	Orangevale	Sacramento	2287	39,700	90,970	43.64%
707296	GUVLCA11	Guerneville	Sonoma	691	-	89,939	0.00%
530440	CRNGCA12	Corning	Tehama	1179	-	89,716	0.00%
707276	ARCTCA11	Arcata	Humboldt	1835	-	89,453	0.00%
707281	BGVLCA11	Bridgeville	Humboldt	173	-	89,077	0.00%
707311	NICECA11	Nice	Lake	465	-	88,610	0.00%
510038	OKLDCA11	Oakland 45th Olympic	Alameda	9172	-	88,471	0.00%
661360	BKFDCA15	Bakersfield Mettler	Kern	299	-	88,208	0.00%
805380	NIPMCA11	Nipomo	San Luis Obispo	999	-	88,020	0.00%
209182	JMTWCA11	Jamestown	Tuolumne	800	-	86,889	0.00%
408143	SNTCCA01	Santa Clara Spacepark	Santa Clara	4768	-	86,502	0.00%
805378	MRBACA11	Morro Bay	San Luis Obispo	993	-	86,371	0.00%
916467	LNGLCA11	Lincoln	Placer	840	-	85,884	0.00%
707329	UPLKCA11	Upper Lake	Lake	388	-	83,640	0.00%
707315	PNARCA11	Point Arena	Mendocino	597	26,725	83,477	32.01%
707279	BDBACA11	Bodega Bay	Sonoma	336	-	83,346	0.00%
559206	ORCVCA11	Orange Cove	Fresno	399	-	81,348	0.00%
408136	SNMACA11	San Martin	Santa Clara	632	-	81,065	0.00%
209240	YSMTCA11	Yosemite Main	Mariposa	529	-	79,884	0.00%
530508	SDSPCA11	Soda Springs	Nevada	527	-	79,397	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
310619	IGWDCA01	Inglewood	Los Angeles	5028	-	79,328	0.00%
530427	ARSNCA11	Anderson	Shasta	1747	-	79,134	0.00%
858785	SNDGCA15	SNDG Regents	San Diego	6954	-	79,119	0.00%
559164	DINBCA01	Dinuba	Tulare	1352	-	78,090	0.00%
707285	CBMTCA11	Cobb Mountain	Lake	317	-	77,134	0.00%
209203	MRPHCA11	Murphys	Calaveras	818	-	76,963	0.00%
559195	MNDTCA11	Mendota	Fresno	448	-	76,929	0.00%
530535	GRVYCA12	Wildwood	Nevada	1442	13,769	76,597	17.98%
530486	PRDSCA11	Paradise Main	Butte	1089	-	76,534	0.00%
858768	POWYCA11	Poway Midland	San Diego	2729	-	76,457	0.00%
831100	APTSCA12	Aptos	Santa Cruz	2864	6,466	76,438	8.46%
916497	SCRMCA01	Sacramento Mn	Sacramento	6182	-	75,992	0.00%
213625	LSANCA03	Madison 03 MA	Los Angeles	5572	-	75,499	0.00%
209161	CTVLCA11	Coulterville	Mariposa	663	-	75,405	0.00%
661403	BVSPCA11	Bear Villy Spring	Kern	334	-	74,992	0.00%
661373	LEBCCA11	Lebec	Kern	386	-	74,689	0.00%
559183	KGBGCA11	Kingsburg	Tulare	1028	-	74,271	0.00%
925029	MORGCA12	Moraga	Contra Costa	1735	-	74,237	0.00%
714804	SNANCA12	Santa Ana West SNAN Bolsa	Orange	2806	16,598	74,071	22.41%
805381	OKVWCA11	Oakview	Ventura	620	-	73,441	0.00%
916537	NSCRCA12	North Natomas	Sacramento	2047	-	72,922	0.00%
707337	RTPKCA11	Rohnert Park	Sonoma	2121	-	72,712	0.00%
661412	PLDLCA11	Palmdale East 47TH ST	Los Angeles	902	-	72,552	0.00%
310618	HWTHCA01	Hawthorne	Los Angeles	5016	-	72,255	0.00%
530509	STAHCA01	South Tahoe Sussex	El Dorado	2731	-	72,231	0.00%
661376	MOJVCA01	Mojave	Kern	581	-	71,609	0.00%
925081	CYTNCA11	Clayton	Contra Costa	1502	-	71,233	0.00%
707287	CTTICA12	Cotati	Sonoma	1983	11,393	71,216	16.00%
559226	TRBLCA11	Terra Bella	Tulare	417	-	70,772	0.00%
530531	RDNGCA11	Redding Enterpr	Shasta	3279	18,119	70,508	25.70%
858786	SNDGCA16	SNDG Mira Mesa	San Diego	5310	-	70,026	0.00%
916476	NWCSCA11	Newcastle	Placer	924	-	69,872	0.00%
559247	FRSNCA15	Fresno Woodward	Fresno	1076	-	69,414	0.00%
831110	GNZLCA11	Gonzales	Monterey	542	-	68,897	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
805366	CYCSCA11	Cayucos	San Luis Obispo	526	-	68,635	0.00%
714739	GRGVCA01	Euclid	Orange	6721	-	66,526	0.00%
661402	WASCCA01	Wasco	Kern	774	20,085	66,272	30.31%
858750	LAJLCA11	La Jolla Girard	San Diego	3647	16,281	63,981	25.45%
415027	MLVYCA01	Mill Valley	Marin	3821	-	63,792	0.00%
559166	FRBHCA11	Firebaugh	Fresno	604	-	63,246	0.00%
530522	WNTRCA11	Winters	Yolo	734	16,119	63,060	25.56%
209176	HERLCA11	Herald	Sacramento	273	-	62,776	0.00%
760717	CRLSCA12	Carlsbad La Costa	San Diego	3662	-	62,771	0.00%
661401	WLBSCA11	Walker Basin	Kern	447	-	61,856	0.00%
831106	CRVYCA11	Carmel Valley	Monterey	1039	-	61,473	0.00%
209209	PNCRCA11	Pinecrest	Tuolumne	921	-	60,972	0.00%
831111	HLSTCA11	Hollister	San Benito	2923	-	60,953	0.00%
209174	GUSTCA11	Gustine	Merced	604	-	59,174	0.00%
805370	FLMRCA11	Fillmore	Ventura	791	-	58,884	0.00%
415068	SNFCCA21	SF Folsom	San Francisco	7656	-	58,445	0.00%
707278	BLKCA11	Blue Lake	Humboldt	236	-	58,019	0.00%
530429	AUBNCA11	Auburn Placer Hills	Placer	1530	-	56,761	0.00%
650031	MSBHCA11	Moss Beach	San Mateo	830	-	56,552	0.00%
619715	CAMPCA11	Campo	San Diego	474	-	56,282	0.00%
559215	RVDLCA11	Riverdale	Fresno	336	-	56,131	0.00%
310663	WLANCA01	Century City	Los Angeles	5791	-	55,368	0.00%
916527	RCKLCA11	Rocklin	Placer	1244	-	55,233	0.00%
510040	OKLDCA13	Oakland Mountain	Alameda	4550	-	55,130	0.00%
559152	ASMTCA11	Sequoia Ash Mtn	Fresno	82	-	54,554	0.00%
831117	SESDCA11	Seaside	Monterey	1845	-	54,451	0.00%
619781	SNDGCA06	SNDG 37th Street	San Diego	3952	-	54,238	0.00%
714797	SLVRCA11	Silverado	Orange	191	-	54,216	0.00%
805387	PSBHCA11	Pismo Beach	San Luis Obispo	736	-	54,019	0.00%
530521	WLWSCA11	Willows	Glenn	989	-	53,383	0.00%
925085	DAVLCA13	Danville Tassajara 13	Contra Costa	2391	-	53,030	0.00%
530514	THCYCA01	Tahoe City	Placer	2438	-	52,998	0.00%
831144	ARMSCA11	Aromas	San Benito	446	-	52,895	0.00%
559154	AVNLCA12	Avenal	Kings	434	-	52,681	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
619794	SNYSACA12	San Ysidro	San Diego	1283	-	52,354	0.00%
559243	MADRCA12	Madera Bonnadelli	Madera	369	-	52,283	0.00%
714811	ANHMA17	ANHM Hills	Orange	848	-	52,121	0.00%
949706	BALBCA01	Balboa	Orange	2703	-	51,441	0.00%
707286	CORDCA12	Cordella	Solano	1340	-	51,378	0.00%
707312	OCNCA11	Occidental	Sonoma	599	-	49,970	0.00%
661368	ERLMCA11	Earlmarl	Tulare	332	-	49,860	0.00%
916536	FLSMCA14	Folsom Blue Ravine	Sacramento	1768	39,374	49,751	79.14%
925083	PLTNCA13	Pleasanton Hacienda	Alameda	1621	-	49,692	0.00%
650043	PCFCCA11	Pacifica	San Mateo	3023	-	49,646	0.00%
209177	HGSNCA11	Hughson	Stanislaus	531	-	49,456	0.00%
805396	TMTNCA11	Templeton	San Luis Obispo	643	-	49,354	0.00%
530433	BLRSCA12	Blairsden	Plumas	901	-	49,064	0.00%
831123	SLNSCA14	Moro	Monterey	1095	-	48,454	0.00%
925050	PSBGCA11	Pittsburg Bay Point Willow	Contra Costa	1095	-	48,373	0.00%
831120	SLNSCA11	Hickory Salinas	Monterey	2176	-	47,742	0.00%
530528	CNVYCA11	Central Valley	Shasta	1528	23,261	47,627	48.84%
209185	LGRNCA12	LaGrande D Pedro	Stanislaus	859	-	47,257	0.00%
619777	SNDGCA01	SNDG C Street	San Diego	5627	-	47,102	0.00%
707307	MKVLCA11	McKinleyville	Humboldt	1103	9,736	46,892	20.76%
530469	LSMLCA11	Los Molinos	Tehama	355	21,947	46,593	47.10%
510080	HRCLCA11	Hercules Pinole	Contra Costa	2622	-	45,967	0.00%
916526	RILNCA12	Rio Linda	Sacramento	1163	-	45,247	0.00%
209236	WLLCCA11	Wallace	Calaveras	400	23,151	44,903	51.56%
209241	YSMTCA12	El Portal	Mariposa	299	-	44,657	0.00%
925077	SUNLCA11	Sunol	Alameda	191	-	44,606	0.00%
209225	STCKCA11	Suttier Creek	Amador	697	-	44,477	0.00%
650056	SNCRCA11	San Carlos	San Mateo	6590	-	44,154	0.00%
559219	SPVLCA11	Springville	Tulare	751	-	44,138	0.00%
408145	SNJSCA21	San Jose Junction	Santa Clara	6140	-	44,129	0.00%
619719	CHVSCA12	Chula Vista Apache	San Diego	2258	5,956	44,012	13.53%
530447	DTFLCA11	Alta Dutch Flats	Placer	538	-	43,835	0.00%
530461	GRDLCA11	Gridley	Butte	797	-	43,743	0.00%
661405	LKLACA11	Lake Los Angeles	Los Angeles	427	-	43,680	0.00%



Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
209187	LGRDCA11	Le Grande	Merced	178	-	43,320	0.00%
209201	MDSTCA04	Modesto Kingswood	Stanislaus	1201	-	43,279	0.00%
650051	PSCDCA11	Pescadero	San Mateo	565	-	43,093	0.00%
805390	SNMICA11	Santa Margarita	San Luis Obispo	540	-	42,927	0.00%
559210	PXLYCA11	Pixley	Tulare	273	-	42,836	0.00%
310613	ELSGCA12	El Segundo Douglas	Los Angeles	4029	-	42,748	0.00%
805363	BRDLCA90	Bradley	Monterey	495	-	42,059	0.00%
530463	HMWDCA11	Homewood	El Dorado	1117	-	41,885	0.00%
209190	LCFRCA11	Lockeford	San Joaquin	241	-	40,677	0.00%
858727	DLMRCA12	Del Mar	San Diego	5494	-	40,412	0.00%
209155	BVLYCA11	Bear Valley	Calaveras	436	-	40,343	0.00%
559242	BURLCA11	Burrell	Fresno	88	-	40,135	0.00%
949749	LNGGCA12	Laguna Niguel	Orange	3371	-	40,081	0.00%
760712	CLXCCA12	Calexico	Imperial	1886	-	40,026	0.00%
209227	THTNCA11	Thornton	San Joaquin	100	-	39,916	0.00%
530474	MTSHCA12	Mount Shasta	Siskiyou	1180	-	39,449	0.00%
661404	LEBCCA12	Pine Mountain	Kern	678	-	39,041	0.00%
925022	LFYTCA11	Lafayette	Contra Costa	2283	-	38,824	0.00%
650026	MLBRCA11	Millbrae	San Mateo	2613	-	38,267	0.00%
707293	FTUNCA11	Fortuna	Humboldt	1102	-	38,148	0.00%
530520	WTLDCA12	Wheatland	Sutter	497	-	37,759	0.00%
209211	PLNDCA11	Planada	Merced	279	-	37,551	0.00%
209204	NWMNCA12	Newman	Stanislaus	549	-	37,512	0.00%
707308	MRNDCA11	Miranda	Humboldt	286	-	37,236	0.00%
760801	WNSPCA12	Warner Springs	San Diego	373	-	37,095	0.00%
760742	HLVCA11	Holtville	Imperial	458	-	36,118	0.00%
707275	ANGWCA11	Angwin	Napa	591	-	36,041	0.00%
949791	SJCPCA12	S J Capistrano	Orange	4048	-	35,832	0.00%
714809	YRLNCA12	Gypsum Canyon	Orange	562	-	34,901	0.00%
619784	SNDGCA14	SNDG Tennyson	San Diego	2848	-	34,696	0.00%
619783	SNDGCA12	SNDG Market Street	San Diego	2184	-	33,865	0.00%
415076	STBHCA11	Stinson Beach	Marin	1202	-	33,640	0.00%
831103	BNLMCA11	Ben Lomond	Santa Cruz	579	-	33,465	0.00%
530432	BGGSCA11	Biggs	Butte	249	-	33,362	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
530464	HRBKCA11	Hombrook	Siskiyou	260	-	33,227	0.00%
209192	ESLCA11	Escalon	San Joaquin	929	-	32,958	0.00%
760707	BRSPCA11	Borrego Springs	San Diego	698	-	32,948	0.00%
559229	TPTNCA11	Tipton	Tulare	199	-	32,856	0.00%
707294	GYVLCA11	Geyersville	Sonoma	295	-	32,547	0.00%
707332	VYFRCA11	Valley Ford	Sonoma	184	-	32,423	0.00%
707317	RIDECA11	Rio Dell	Humboldt	238	18,122	32,097	56.46%
559208	PRLRCA11	Parlier	Fresno	469	-	31,750	0.00%
530468	LVOKCA11	Live Oak	Sutter	672	-	31,160	0.00%
949807	IRVNCA11	Irvine Airport	Orange	5656	-	31,116	0.00%
530481	NYUBCA11	North Yuba	Yuba	515	-	29,786	0.00%
559157	CRTHCA11	Caruthers	Fresno	383	-	29,715	0.00%
530450	ESPRCA11	Esparto	Yolo	266	-	29,375	0.00%
626660	SPSDCA11	Sout Pasadena Mission	Los Angeles	2834	-	29,159	0.00%
831104	CHLRCA11	Chualar	Monterey	136	-	28,848	0.00%
949808	RSMGCA11	R S Margarita	Orange	2003	-	28,744	0.00%
415023	LKSCA11	Larkspur Corte Madera	Marin	3120	-	28,622	0.00%
415069	SNGNCA11	San Geronimo	Marin	461	-	28,570	0.00%
760713	CLPTCA11	Calpatra	Imperial	259	-	28,477	0.00%
619728	DLZRCA11	Dulzura	San Diego	504	-	28,378	0.00%
559165	FRVLCA11	Farmersville	Tulare	401	-	27,801	0.00%
925042	ORNDCA11	Orinda	Contra Costa	1932	-	27,680	0.00%
707325	TMLSCA12	Tomales	Sonoma	287	-	27,618	0.00%
707336	YNVLC A11	Yountville	Napa	819	-	27,544	0.00%
707326	TRNDCA11	Trinidad	Humboldt	296	-	27,229	0.00%
619853	OTMSCA11	Otay Mesa	San Diego	986	-	26,841	0.00%
925041	OKLYCA11	Oakley	Contra Costa	1105	-	26,657	0.00%
831108	FETNCA11	Felton	Santa Cruz	976	-	26,254	0.00%
530512	STAHCA13	South Tahoe Meyers Apache	El Dorado	785	-	26,229	0.00%
559246	GSHNCA11	Goshen	Tulare	730	-	26,113	0.00%
530477	NCLSCA12	Nicolaus	Sutter	98	-	26,112	0.00%
707298	HPLDCA12	Hopland	Mendocino	201	-	25,981	0.00%
530532	GRVYCA11	Lake of the Pine	Nevada	1863	-	25,960	0.00%
408142	SNJS CA22	San Jose Bailey	Santa Clara	149	-	25,850	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
619766	PNVYCA11	Pine Valley	San Diego	247	-	25,547	0.00%
831116	SCVYCA01	Scotts Valley	Santa Cruz	1367	-	25,197	0.00%
831124	SNARCA11	San Ardo	Monterey	119	-	25,111	0.00%
831107	CSVLCA11	Castroville	Monterey	1012	-	24,845	0.00%
619754	NTCYCA11	National City Highland	San Diego	1415	-	24,742	0.00%
858763	PCBHCA11	Hornblend	San Diego	548	-	24,330	0.00%
530434	BCWYCA11	Brockway	Placer	924	-	23,972	0.00%
209214	RVRBCA11	Riverbank	Stanislaus	992	-	23,589	0.00%
818665	CLBSCA50	Calabasas Los Virgenes	Los Angeles	1058	-	23,283	0.00%
619852	RNSDCA11	Rancho San Diego	San Diego	814	-	23,052	0.00%
949776	SNCLCA12	San Clemente	Orange	2602	-	22,980	0.00%
530437	CHLNCA11	Challange	Yuba	1149	-	22,682	0.00%
559167	FVPNCA11	Five Points	Fresno	151	-	22,427	0.00%
650021	LAHNCA11	La Honda	San Mateo	389	-	22,156	0.00%
530455	FRGLCA11	French Gulch	Shasta	82	-	21,966	0.00%
925008	BTISCA11	Bethel Island	Contra Costa	265	-	21,915	0.00%
559163	DLRYCA11	Del Rey	Fresno	143	-	21,705	0.00%
831113	MARNCA11	Marina	Monterey	1358	-	21,687	0.00%
619746	JCMBCA11	Jacumba	San Diego	371	-	21,592	0.00%
831135	SNLCCA11	San Lucas	Monterey	43	-	21,562	0.00%
415073	SNRFCA11	Parkway	Marin	2956	-	21,352	0.00%
530458	GRBRCA11	Gerber	Tehama	182	-	20,926	0.00%
650046	PLALCA12	Palo Alto South	Santa Clara	4001	-	20,911	0.00%
530480	NSJNCA11	North San Juan	Nevada	490	-	20,740	0.00%
916491	PLGVCA12	Pleasant Grove	Placer	160	-	20,645	0.00%
925082	BSRNCA70	Bishop Ranch	Contra Costa	1443	-	20,613	0.00%
916533	RNMRC A11	Rancho Murietta	Sacramento	523	-	20,188	0.00%
707333	WEOTCA11	Weott	Humboldt	63	-	20,157	0.00%
760743	IMPRCA11	Imperial	Imperial	559	-	19,900	0.00%
530436	CMPVCA11	Camptonville	Yuba	216	-	19,650	0.00%
530446	DNSMCA11	Dunsmuir	Siskiyou	413	-	19,473	0.00%
530507	SMAVCA11	Smartsville	Yuba	318	-	19,293	0.00%
530492	PTOLCA01	Portola	Plumas	982	-	19,236	0.00%
707283	CLOKCA11	Clear Lake Oaks	Lake	536	-	19,221	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
310628	LSANCA07	LSAN Airport	Los Angeles	7220	-	19,121	0.00%
805355	AVBHCA11	Avila Beach	San Luis Obispo	337	-	19,066	0.00%
530445	DNGNCA12	Dunnigan	Yolo	113	-	18,518	0.00%
559178	HURNCA11	Huron	Fresno	294	-	18,336	0.00%
415075	SSLTCA11	Sausalito Larkspur	Marin	1737	-	17,833	0.00%
415048	PRSNCA11	Point Reyes	Marin	825	-	17,794	0.00%
415019	IGNCCA12	Ignacio	Marin	1539	-	17,718	0.00%
209248	MDSTCA05	Modesto Tally	Stanislaus	634	-	17,275	0.00%
707299	HYVLCA11	Hydesville	Humboldt	265	-	17,119	0.00%
760856	NILDCA12	Ninland Bombay Beach	Imperial	98	-	16,814	0.00%
415020	INVRCA11	Inverness	Marin	447	-	16,784	0.00%
805386	PIRUCA11	Piru	Ventura	145	-	15,616	0.00%
408139	SNVACA11	Mathilda Sunneynvale	Santa Clara	1662	-	15,573	0.00%
530425	ALGHCA11	Alleghaney	Sierra	47	-	15,482	0.00%
530471	LLTNCA11	Loyalton	Plumas	546	-	15,172	0.00%
530466	LSTNCA11	Lewiston	Trinity	508	4,855	14,930	32.52%
530448	EKCKCA11	Elk Creek	Glenn	100	-	14,917	0.00%
209202	MKHLCA12	Mokelumne Hill	Cataveras	183	-	14,871	0.00%
760855	NILDCA11	Niland Main	Imperial	83	-	14,460	0.00%
559224	SRFRCA11	Stratford	Kings	85	-	14,407	0.00%
559186	LATNCA11	Laton	Fresno	182	-	14,000	0.00%
530524	YREKCA11	Yreka	Siskiyou	1314	-	13,848	0.00%
619723	CRNDCA11	Coronado	San Diego	1724	10,589	13,839	76.52%
530430	BNGRCA11	Bangor	Butte	335	-	13,720	0.00%
209238	WANACA11	Wawana	Mariposa	267	-	13,352	0.00%
530518	WEEDCA01	Weed	Siskiyou	847	-	13,016	0.00%
619851	JAMLCA60	Jamul	San Diego	322	-	13,013	0.00%
858854	RNPSCA11	Rancho Penasquitos	San Diego	1446	-	12,207	0.00%
707322	ANNPCA11	Annapolis	Sonoma	71	-	12,067	0.00%
559156	CMNLCA11	Camp Nelson	Tulare	680	-	11,900	0.00%
707301	LKBRC A11	Lake Berryessa	Napa	188	-	11,886	0.00%
831122	SLNSCA13	Hunter	Monterey	680	-	11,406	0.00%
707324	SUISCA11	Suisun City	Solano	345	-	11,330	0.00%
415033	NICSCA11	Nicasio	Marin	250	-	11,117	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
530505	SRCYCA11	Sierra City	Sierra	430	-	10,677	0.00%
530517	VINACA12	Vina	Tehama	69	-	10,211	0.00%
530462	HMCYCA11	Hamilton City	Glenn	145	-	9,970	0.00%
209162	CWLDCA12	Crows Landing	Stanislaus	91	-	9,812	0.00%
760796	SHSHCA11	Shoshone	San Bernardino	137	-	9,499	0.00%
707303	LOLTCA11	Lolita	Humboldt	123	-	9,355	0.00%
530444	DWNVCA11	Downieville	Sierra	239	-	8,963	0.00%
530529	MTAGCA11	Montague	Siskiyou	534	-	8,569	0.00%
831121	SLNSCA12	Glenview	Monterey	556	-	8,556	0.00%
707288	ELK CA11	Elk	Mendocino	211	8,060	8,477	95.08%
530465	KYBRCA11	Kyburz	El Dorado	60	-	8,164	0.00%
530516	TRUCCA12	North Star	Placer	606	-	7,483	0.00%
209184	KNFYCA11	Knights Ferry	Stanislaus	141	4,871	7,234	67.33%
831127	SNJNCA11	San Juan Bautista	San Benito	384	-	7,077	0.00%
818620	LACNCA11	La Canada Oak Grove	Los Angeles	14	-	7,013	0.00%
661369	EDWRCA01	Edwards	Kern	137	-	6,702	0.00%
760753	MTPSCA11	Mountain Pass	San Bernardino	19	-	6,590	0.00%
707313	PPWDCA11	Pepperwood	Humboldt	75	-	6,529	0.00%
818606	BRBNCA13	Burbank Thornton	Los Angeles	755	-	6,093	0.00%
530511	STAHCA12	South Tahoe Tamarack	El Dorado	128	-	6,042	0.00%
760738	FRCKCA11	Furnace Creek	San Bernardino	140	-	5,860	0.00%
530513	STFRCA11	Stonyford	Colusa	138	-	5,436	0.00%
530473	MRDNCA11	Meridan	Sutter	150	-	5,420	0.00%
530496	RCVACA11	Richvale	Butte	107	-	5,405	0.00%
760714	CMPDCA01	Camp Pendleton	San Diego	107	-	5,250	0.00%
831140	TRPSCA11	Tres Pinos	San Benito	214	-	4,801	0.00%
530431	BEALCA11	Beale	Yuba	78	-	4,622	0.00%
949806	MSVJCAAT	Mission Viejo	Orange	1889	-	4,533	0.00%
530506	SRVLCA11	Sierraville	Sierra	162	-	4,145	0.00%
559189	LEMRC A12	Lemore Wyman	Kings	87	-	3,883	0.00%
415005	TBRNCA11	Tiburon	Marin	1686	-	3,569	0.00%
530460	GRNDCA13	Grenada	Siskiyou	81	-	3,010	0.00%
714805	TUSTCA70	Tustin 70	Orange	658	-	2,698	0.00%
530488	PSKNCA11	Paskenta	Tehama	101	-	2,639	0.00%

Table 7.18 GO 133-D \$9.7 "ALT INVESTMENTS" vs. TOTAL REHAB EXPENDITURES (Sorted by Other Rehab Expenditures) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	Pct GO 133-D \$9.7
760726	CYWLCA11	Coyote Wells	Imperial	46	-	1,680	0.00%
510011	CRCTCA02	Crockett	Contra Costa	289	-	1,666	0.00%
760705	BAKRCA11	Baker	San Bernardino	114	-	1,308	0.00%
209249	MDSTCA52	Modesto Davis	Stanislaus	18	-	1,268	0.00%
415084	SNFCCA64	UC Hospital	San Francisco	-	-	1,167	0.00%
949810	IRVNCA12	Spectrum Irvine	Orange	1708	-	948	0.00%
530435	BTCYCA11	Butte City	Glenn	109	-	423	0.00%
530456	GZLLCA11	Gazelle	Siskiyou	44	-	-	-
916497	SCRMALR	Sequoia Pacific State	Sacramento	6182	-	-	-
916538	SCRMAMZ	P Street State	Sacramento	-	-	-	-
916539	SCRMATE	First Ave DMV State	Sacramento	-	-	-	-
TOTALS 2018-2019				1,915,900	2,725,499	107,211,728	2.54%

Table 7.19

AT&T CALIFORNIA

2018-2019 SERVICE QUALITY METRICS IN WIRE CENTERS RECEIVING
GO 133-D \$9.7 "ALTERNATIVE INVESTMENTS" AND OTHER REHAB EXPENDITURES
(Sorted by Percent Cleared within 24 Hours)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Durath (mins)
530431	BEALCA11	Beale	Yuba	78	-	4,622	0	0	-	5.19	7471
760753	MTPSCA11	Mountain Pass	San Bernardino	19	-	6,590	2	2	-	7.16	7123
760733	WEOTCA11	Weott	Humboldt	63	-	20,157	1	1	-	6.67	4612
760738	FRGKCA11	Furnace Creek	San Bernardino	140	-	5,860	1	1	0	43.29	21026
760705	BAKRCA11	Baker	San Bernardino	114	-	1,308	2	2	0	7.05	7325
707322	ANNPCA11	Annapolis	Sonoma	71	-	12,067	3	2	0	18.77	11056
760796	SHSHCA11	Shoshone	San Bernardino	137	-	9,499	4	4	0	18.71	16171
530456	GZLLCA11	Gazelle	Siskiyou	44	-	-	2	1	0	4.81	4693
209240	YSMTCA11	Yosemite Main	Mariposa	529	-	79,884	1	1	0	11.12	7411
209241	YSMTCA12	El Portal	Mariposa	299	-	44,657	2	2	0	14.32	9764
209238	WANACA11	Wawana	Mariposa	267	-	13,352	1	0	0	9.67	8295
530455	FRGLCA11	French Gulch	Shasta	82	-	21,966	5	4	0	77.86	26999
530513	STFRCA11	Stonyford	Colusa	138	-	5,436	2	2	0	12.98	10459
530465	KYBRCA11	Kyburz	El Dorado	60	-	8,164	2	2	0	10.71	8990
831101	BGSRCA11	Big Sur	Monterey	389	-	122,197	4	3	0	5.76	4449
707315	PNARCA11	Point Arena	Mendocino	597	26,725	83,477	2	2	0	12.38	7611
707278	BLKCA11	Blue Lake	Humboldt	236	-	58,019	3	2	0	8.84	8663
559219	SPVLCA11	Springville	Tulare	751	-	44,138	3	2	0	10.21	6456
559152	ASMTCA11	Sequoia Ash Mtn	Fresno	82	-	54,554	4	4	0	4.84	5577
530425	ALGHCA11	Alleghaney	Sierra	47	-	15,482	4	4	0	7.28	5138
707288	ELK CA11	Elk	Mendocino	211	8,060	8,477	3	2	0	11.57	6991
209155	BVLYCA11	Bear Valley	Calaveras	436	-	40,343	2	1	0	34.84	14786
209185	LGRNCA12	LaGrande D Pedro	Stanislaus	859	-	47,257	3	0	0	9.97	5892
530511	STAHC12	South Tahoe Tamarack	El Dorado	128	-	6,042	2	1	0	9.42	7462
559156	CMNLCA11	Camp Nelson	Tulare	680	-	11,900	2	2	0	8.98	6236
530466	LSTNCA11	Lewiston	Trinity	508	4,855	14,930	2	2	0	11.27	6539
707295	GULLCA11	Gualala	Mendocino	1066	-	96,671	2	2	0	11.01	6949
707301	LKBRCA11	Lake Berryessa	Napa	188	-	11,886	3	3	0	9.86	5869
530448	EKGKCA11	Elk Creek	Glenn	100	-	14,917	4	3	0	8.09	5305
707316	PTVYCA11	Potter Valley	Mendocino	528	-	272,174	4	3	0	13.29	7839
760856	NILDCA12	Ninland Bombay Beach	Imperial	98	-	16,814	2	2	0	5.50	4723
707313	PPWDCA11	Pepperwood	Humboldt	75	-	6,529	3	2	0	5.17	3732
760855	NILDCA11	Niland Main	Imperial	83	-	14,460	3	2	0	6.02	3662
530430	BNGRCA11	Bangor	Butte	335	-	13,720	4	3	0	11.30	5919
661401	WLBSCA11	Walker Basin	Kern	447	-	61,856	4	4	0	5.42	3815
619851	JAMLCA60	Jamul	San Diego	322	-	13,013	2	1	0	7.72	5368
707280	BNVLC11	Boonville	Mendocino	645	12,118	121,299	3	2	0	11.62	6784

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratn (mins)
530490	PLVCA12	Placerville Niagara	El Dorado	2240	5,875	220,920	4	3	0	14.33	8399
530485	ORVCA12	Oroville East	Butte	1522	11,418	139,512	5	3	0	7.37	5200
707308	MNRDCA11	Miranda	Humboldt	286	-	37,236	2	1	0	6.32	5725
559154	AVNLCA12	Avenal	Kings	434	-	52,681	3	2	0	7.02	4344
760735	FLBKCA12	Fallbrook	San Diego	3475	-	356,664	3	2	0	10.19	6823
209161	CTVLA11	Coulterville	Mariposa	663	-	75,405	5	4	0	13.09	6862
559242	BURLCA11	Burrell	Fresno	88	-	40,135	5	4	0	5.17	3624
530457	GRTWCA11	Georgetown	El Dorado	1339	40,908	100,410	4	3	0	10.77	6103
209203	MRPHCA11	Murphys	Calaveras	818	-	76,963	3	2	0	16.43	10834
650031	MSBHCA11	Moss Beach	San Mateo	830	-	56,552	1	1	0	7.51	4850
707309	MNRICA11	Monte Rio	Sonoma	518	-	96,663	3	2	0	12.51	8492
805382	OJAICA11	Ojai	Ventura	1639	-	307,558	2	1	0	21.04	11969
619728	DLZRCA11	Dulzura	San Diego	504	-	28,378	3	2	0	8.62	5069
559186	LATNCA11	Laton	Fresno	182	-	14,000	5	3	0	6.45	3601
760801	WNSPCA12	Warner Springs	San Diego	373	-	37,095	3	2	0	9.11	5202
707294	GYVLA11	Geyersville	Sonoma	295	-	32,547	2	2	0	15.86	12237
760748	JULNCA12	Julian	San Diego	879	-	106,381	2	2	0	7.54	4652
619715	CAMPCA11	Campo	San Diego	474	-	56,282	2	2	0	7.10	4106
760764	PALACA11	Pauma Valley	San Diego	812	-	92,036	4	3	0	6.80	4398
707305	MNDCA11	Mendocino	Mendocino	1560	-	155,033	2	1	0	9.76	6335
805363	BRDLCA90	Bradley	Monterey	495	-	42,059	1	1	0	5.01	3096
530528	CNVYCA11	Central Valley	Shasta	1528	23,261	47,627	3	2	0	11.25	6530
559229	TPTNCA11	Tipton	Tulare	199	-	32,856	4	3	0	6.79	4380
209202	MKHLCA12	Mokelumme Hill	Calaveras	183	-	14,871	3	2	0	11.05	6167
209162	CWLDCA12	Crows Landing	Stanislaus	91	-	9,812	3	2	0	5.84	4029
805381	OKVWCA11	Oakview	Ventura	620	-	73,441	2	2	0	16.96	9619
530427	ARSNCA11	Anderson	Shasta	1747	-	79,134	3	2	0	11.13	6322
831124	SNARCA11	San Ardo	Monterey	119	-	25,111	2	1	0	6.31	3920
530432	BGGSCA11	Biggs	Butte	249	-	33,362	2	2	0	7.02	4949
650021	LAHNCA11	La Honda	San Mateo	389	-	22,156	2	1	0	7.30	4518
619778	SNDGCA02	SNDG University	San Diego	5448	-	110,551	1	0	0	7.55	4480
209173	GVLDCA11	Groveland	Tuolumne	1863	-	205,768	2	2	0	11.49	6323
661360	BKFDCA15	Bakersfield Mettler	Kern	299	-	88,208	1	1	0	10.30	5707
559226	TRBLCA11	Terra Bella	Tulare	417	-	70,772	5	3	0	5.72	3930
916476	NWCSCA11	Newcastle	Placer	924	-	69,872	2	2	0	7.19	4524
530446	DNSMCA11	Dunsmuir	Siskiyou	413	-	19,473	1	1	0	4.94	4553
619794	SNYSKA12	San Ysidro	San Diego	1283	-	52,354	1	1	0	7.86	4834
530441	CTWDCA11	Cottonwood	Tehama	2138	-	116,846	4	3	0	10.80	6043
661374	LNVYCA11	Leona Valley	Los Angeles	322	45,885	156,071	4	2	0	6.54	4330
805386	PIRUCA11	Piru	Ventura	145	-	15,616	2	1	0	3.71	3385
707332	VYFRCA11	Valley Ford	Sonoma	184	-	32,423	2	1	0	10.02	6228
209151	ARNLCA11	Arnold	Calaveras	1936	-	197,594	2	2	0	12.27	6291
707297	HLBGCA11	Healdsburg	Sonoma	2672	16,075	162,508	2	1	0	7.03	6738
760799	VLCTCA11	Valley Center	San Diego	2286	-	157,356	2	1	0	7.53	4284
805390	SNMICA11	Santa Margarita	San Luis Obispo	540	-	42,927	2	1	0	4.35	3054

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratin (mins)
760769	RAMNCA11	Ramona	San Diego	1878	-	148,412	2	1	0	8.15	4951
707284	CODLCA11	Cloverdale	Sonoma	832	-	130,963	3	2	0	11.33	5981
619781	SNDGCA06	SNDG 37th Street	San Diego	3952	-	54,238	1	1	0	7.41	4219
530508	SDSPCA11	Soda Springs	Nevada	527	-	79,397	2	1	0	8.62	4915
661403	BVSPCA11	Bear Villy Spring	Kern	334	-	74,992	3	2	0	8.34	4940
858771	RSFECA12	Rancho Santa Fe	San Diego	3255	-	98,303	1	1	0	7.00	4236
760714	CMPDCA01	Camp Pendleton	San Diego	1057	-	5,250	1	1	0	4.60	2926
530450	ESPRCA11	Esparto	Yolo	266	-	29,375	3	2	0	9.22	7855
661404	LEBCCA12	Pine Mountain	Kern	678	-	39,041	2	1	0	6.56	4213
661373	LEBCCA11	Lebec	Kern	386	-	74,689	3	2	0	5.99	3594
530489	PLVCA11	Placerville Main	El Dorado	7102	78,185	445,092	3	2	0	11.22	6208
530512	STAHCA13	South Tahoe Meyers Apache	El Dorado	785	-	26,229	1	0	0	8.90	5055
530437	CHLNCA11	Challenge	Yuba	1149	-	22,682	3	2	0	8.06	6477
619746	JCMBCA11	Jacumba	San Diego	371	-	21,592	3	2	0	6.36	4017
530475	NVCYCA11	Nevada City	Nevada	3415	29,760	175,423	2	2	0	10.57	6008
707336	YNVCA11	Yountville	Napa	819	-	27,544	2	1	0	10.94	7981
707298	HPLDCA12	Hopland	Mendocino	201	-	25,981	2	2	0	17.30	8691
530484	ORVCA11	Oroville Main	Butte	3496	-	122,572	2	2	0	8.172	8172
707314	PTLMCA01	Petaluma	Sonoma	4990	-	227,253	1	1	0	10.90	6192
530503	SHLKCA01	Shasta Lake	Shasta	342	-	101,712	6	4	0	11.03	6034
619793	SNDGCA12	SNDG Market Street	San Diego	2184	-	33,865	2	1	0	8.47	5555
760713	CLPTCA11	Calpatria	Imperial	259	-	28,477	1	1	0	5.71	3543
209184	KNFYCA11	Knights Ferry	Stanislaus	141	4,871	7,234	1	1	0	11.34	5356
707281	BGVCA11	Bridgeville	Humboldt	173	-	89,077	4	3	0	4.62	3078
619794	SNDGCA14	SNDG Tennyson	San Diego	2848	-	34,696	1	1	0	7.11	4287
559160	CLNGCA01	Coalinga	Fresno	817	-	128,060	2	1	0	6.03	3759
510052	RCMDCA11	Richmond SF	Contra Costa	7128	-	348,378	2	1	0	9.31	4707
619700	ALPICA12	Alpine	San Diego	1624	47,280	118,847	3	2	0	8.89	4594
619744	IMBHCA11	Imperial Beach	San Diego	2049	12,190	99,724	1	1	0	8.66	4835
858763	PCBHCA11	Hornblend	San Diego	548	-	24,330	1	1	0	7.86	4843
559239	WDLKCA11	Woodlake	Tulare	533	-	130,178	4	3	0	5.06	3480
530504	SGSPCA11	Shingle Springs	El Dorado	3431	34,518	288,615	2	2	0	9.75	5323
619754	NTCYCA11	National City Highland	San Diego	1415	-	24,742	1	1	0	6.69	4009
510011	CRCTCA02	Crockett	Contra Costa	289	-	1,666	1	1	0	11.16	5473
619751	LKSDCA12	Lakeside	San Diego	1795	-	172,614	2	1	0	7.70	4404
707325	TMLSCA12	Tomales	Sonoma	287	-	27,618	1	1	0	10.12	5306
209150	ANCMCA01	Angels Camp	Calaveras	809	-	100,528	2	1	0	9.99	5486
626654	ROSMCA11	Rosemead	Los Angeles	6423	-	163,405	1	0	0	8.06	4958
209212	PLMOCA11	Plymouth	Amador	1528	-	117,107	3	2	0	8.15	4426
530509	STAHCA01	South Tahoe Sussex	El Dorado	2731	-	72,231	1	0	0	9.60	5578
650028	MNPKCA11	Menlo Park	San Mateo	4016	-	175,028	2	2	0	7.86	4710
559213	PTVCA11	Porterville	Tulare	4993	12,698	215,603	2	1	0	5.64	3738
530484	HRBKCA11	Hornbrook	Siskiyou	260	-	33,227	3	2	0	6.22	4213
530445	DNGNCA12	Dunnigan	Yolo	113	-	18,518	2	2	0	13.73	8283
530488	PSKNCA11	Paskenta	Tehama	101	-	2,639	2	2	0	6.96	4443

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratn (mins)
619853	OTMSCA11	Olaj Mesa	San Diego	986	-	26,841	1	0	0	8.00	4576
707287	CTTICA12	Colati	Sonoma	1983	11,393	71,216	1	1	0	10.81	6074
619723	CRNDCA11	Coronado	San Diego	1724	10,589	13,839	1	0	0	8.91	4732
707292	FTBRCA02	Fort Bragg	Mendocino	3227	49,006	571,959	2	1	0	10.58	5569
209174	GUSTCA11	Gustine	Merced	604	-	59,174	3	2	0	6.94	4455
530496	RCVACA11	Richvale	Butte	107	-	5,405	1	0	0	9.27	5285
626658	SNGBCA01	San Gabriel	Los Angeles	4610	19,071	235,554	1	1	0	7.01	4213
949776	SNCLCA12	San Clemente	Orange	2602	-	22,980	1	1	0	7.01	4844
909720	COTNCA11	Colton	San Bernardino	3205	-	304,731	2	2	0	6.79	4114
858750	LAJLCA11	La Jolla Girard	San Diego	3647	16,281	63,981	1	1	0	8.29	4915
559228	THRRCA11	Three Rivers	Tulare	609	59,250	99,547	5	3	0	4.53	3252
619780	SNDGCA05	SNDG Saipan	San Diego	2182	-	106,177	2	1	0	8.02	4657
831104	CHLRCA11	Chualar	Monterey	136	-	28,848	1	1	0	6.58	3993
650024	LSATCA11	Los Altos	Santa Clara	4386	45,785	236,071	2	0	0	7.70	4780
530516	TRUCCA12	North Star	Placer	606	-	7,483	0	1	0	9.97	5935
530459	GRVYCA01	Grass Valley	Nevada	7879	28,787	284,966	2	1	0	9.39	5271
805364	CMBACA11	Cambria	San Luis Obispo	1435	-	170,952	1	1	0	3.93	2673
858727	DLMRCA12	Del Mar	San Diego	5494	-	40,412	1	0	0	7.89	4858
661395	THCHCA01	Techachapi	Kern	1787	-	184,186	2	1	0	7.57	4568
707296	GUVLCA11	Guerneville	Sonoma	691	-	89,939	2	1	0	13.10	6745
707319	SNRSCA11	Los Alamos	Sonoma	2537	-	91,433	1	1	0	15.90	9754
559224	SRFRCA11	Stratford	Kings	85	-	14,407	3	2	0	6.31	3417
559231	TULRCA11	Tulare	Tulare	3875	-	367,230	2	1	0	5.99	3577
530495	RDNCA02	Redding Main	Shasta	4862	-	531,011	2	1	0	9.72	5867
707291	FSVLCA11	Forestville	Sonoma	737	-	147,241	3	2	0	11.31	5930
707329	UPLKCA11	Upper Lake	Lake	388	-	83,640	3	2	0	18.56	8751
209225	STCKCA11	Sutter Creek	Amador	697	-	44,477	2	2	0	8.84	4536
805366	CYCSCA11	San Andreas	Calaveras	1238	-	110,300	3	2	0	8.89	4407
619718	CHVSCA11	Cayucos	San Luis Obispo	526	-	68,635	1	1	0	4.24	2746
530507	SMAVCA11	Chula Vista Third Avenue	San Diego	3894	8,957	165,333	1	1	0	7.36	4346
559208	PRLRCA11	Smartsville	Yuba	318	-	19,293	2	2	0	8.45	4817
619766	PNVYCA11	Parlier	Fresno	469	-	31,750	2	1	0	5.02	3181
530518	WEEDCA01	Pine Valley	San Diego	247	-	25,547	2	1	0	6.54	4156
530529	MTAGCA11	Weed	Siskiyou	847	-	13,016	1	1	0	4.48	2922
626601	ALHBCA01	Montague	Siskiyou	534	-	8,569	1	1	0	5.03	3221
559210	PXYLCA11	Alhambra	Los Angeles	8889	-	232,806	1	1	0	7.42	4521
760732	ENCTCA12	Pixley	Tulare	273	-	42,836	3	2	0	6.11	3563
619777	SNDGCA01	Encinitas	San Diego	4571	-	234,551	1	1	0	5.74	3752
209234	VYSPCA11	SNDG C Street	San Diego	5627	-	47,102	1	0	0	7.23	4353
559178	HURNCA11	Valley Springs	Calaveras	1100	14,574	92,954	3	2	0	8.16	4479
530523	WDLRCA11	Huron	Fresno	294	-	18,336	2	1	0	6.53	3574
858762	PCBHCA01	Woodland	Yolo	4358	-	181,131	1	1	0	9.86	5862
858785	SNDGCA15	Garnet	San Diego	4157	-	284,411	1	1	0	8.39	4755
805355	AVBHCA11	SNDG Regents	San Diego	6954	-	79,119	1	0	0	8.32	5078
		Avila Beach	San Luis Obispo	337	-	19,066	1	1	0	3.49	2454

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratin (mins)	
209233	TWHRCA11	Twain Harte	Tuolumne	1607	-	122,275	2	1	1	0	8.47	4730
510013	ELSBACA11	Rich Applan Way El Sobrante	Contra Costa	3219	-	150,753	2	1	0	0	7.37	4484
760708	BRWLCA11	Brawley	Imperial	1759	-	108,509	1	1	0	0	6.17	3487
650046	PLALCA12	Palo Alto South	Santa Clara	4001	-	20,911	1	1	0	0	7.27	4484
559167	FVPNCA11	Five Points	Fresno	151	-	22,427	3	2	0	0	6.75	3848
707312	OCNCA11	Occidental	Sonoma	599	-	49,970	2	1	0	0	8.53	4750
707443	DIXNCA11	Dixon	Solano	1345	-	110,688	2	1	0	0	10.33	7298
650016	HMBACA12	Half Moon Bay	San Mateo	2349	37,312	91,019	1	1	0	0	8.40	4429
559215	RVDLCA11	Riverdale	Fresno	336	-	56,131	4	2	0	0	6.62	3842
858854	RNPSCA11	Rancho Penasquitos	San Diego	1446	-	12,207	0	0	0	0	10.55	5929
530531	RDNGCA11	Redding Enterpr	Shasta	3279	18,119	70,508	1	1	0	0	8.76	5025
559163	DLRYCA11	Del Rey	Fresno	143	-	21,705	2	1	0	0	10.61	5521
530438	CHICCA01	Chico Main	Butte	10221	6,955	287,579	1	1	0	0	6.73	4497
619719	CHVSCA12	Chula Vista Apache	San Diego	2258	5,956	44,012	1	0	0	0	7.27	4589
707335	WNSCA11	Windsor	Sonoma	1693	-	134,483	1	1	0	0	11.08	7176
831118	SLDDCA11	Soledad	Monterey	947	-	148,989	1	1	0	0	4.94	2907
661392	SHFTCA11	Shafter	Kern	772	-	99,573	2	1	0	0	4.45	2901
408130	SNUSCA12	San Jose Dial Way	Santa Clara	13069	36,755	282,004	1	1	0	0	7.50	4516
707279	BBBACA11	Bodega Bay	Sonoma	336	-	83,346	2	1	0	0	9.56	5987
323638	LSANCA23	LSAN Capitol	Los Angeles	7035	-	207,342	1	1	0	0	7.36	4186
415058	SNFCCA01	SF Bush Pine	San Francisco	14854	-	319,373	1	0	0	0	6.28	3665
760716	CRLSCA11	Carlsbad Harding	San Diego	2206	-	98,008	1	1	0	0	7.89	4450
626611	ELMNCA01	El Monte	Los Angeles	9210	7,436	260,083	1	1	0	0	7.77	4360
619752	LAMSCA01	La Mesa	San Diego	5791	29,460	338,207	1	1	0	0	6.79	4025
619729	ELCJCA11	El Cajon	San Diego	4004	4,702	326,642	1	1	0	0	6.53	3873
626602	ARCDCA11	Arcadia	Los Angeles	4800	-	168,770	1	1	0	0	7.97	4360
760800	VISTCA12	Vista	San Diego	5720	-	393,191	1	1	0	0	6.63	4407
707317	RIDCA11	Rio Dell	Humboldt	238	18,122	32,097	1	0	0	0	4.10	2423
707326	TRNDCA11	Trinidad	Humboldt	296	-	27,229	2	1	0	0	4.43	3040
619852	RNSDCA11	Rancho San Diego	San Diego	814	-	23,052	1	0	0	0	6.58	4616
650045	PLALCA02	Palo Alto Main	Santa Clara	10518	-	120,501	1	1	0	0	7.20	4462
707311	NICECA11	Nice	Lake	465	-	88,610	3	2	0	0	12.26	5911
805400	VNTRCA02	Ventura Fir	Ventura	2365	-	163,802	1	1	0	0	19.30	8466
707302	LKPTCA02	Lakeport	Lake	2039	-	190,486	2	1	0	0	15.87	7025
530487	PRDSCA12	Paradise Pines	Butte	1026	-	93,950	3	2	0	0	12.43	7823
559188	LEMRCAT11	Lemore Main	Kings	1200	15,802	156,276	2	1	0	0	6.11	3645
831109	GNFDCAT11	Green Field	Monterey	940	-	185,052	1	1	0	0	4.86	2959
530429	AUBNCA11	Auburn Placer Hills	Placer	1530	-	56,761	2	1	0	0	7.43	4049
415073	SNRFCA11	Parkway	Marin	2956	-	21,352	1	1	0	0	7.46	3993
530474	MTSHCA12	Mount Shasta	Siskiyou	1180	-	39,449	1	1	0	0	4.16	3652
510080	HRCLCA11	Hercules Pinole	Contra Costa	2622	-	45,967	1	1	0	0	7.63	4276
530458	GRBRCA11	Gerber	Tehama	182	-	20,926	3	2	0	0	4.85	3605
707306	MDTWCA11	Middletown	Lake	874	-	172,164	2	1	0	0	9.58	5062
209237	WTFRCA11	Waterford	Stanislaus	758	-	108,950	3	2	0	0	7.87	4197
619782	SNDDCA11	SNDD College	San Diego	2566	-	157,196	1	1	0	0	8.12	5692

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

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909741	HGLDCA11	Highland	San Bernardino	2208	-	260,788	2	1	0	6.99	4366
209209	PNCRC11	Pinecrest	Tuolumne	921	-	60,972	1	1	0	5.58	4152
951775	RVSDCA11	Woodcrest	Riverside	2640	-	205,180	1	1	0	6.68	3830
650051	PSDC11	Pescadero	San Mateo	565	-	43,093	1	1	0	7.19	4388
209177	HGSNCA11	Hughson	Stanislaus	531	-	49,456	2	1	0	8.46	4949
530471	LLTNCA11	Loyalton	Plumas	546	-	15,172	1	1	0	3.39	2537
530435	BTCYCA11	Butte City	Glenn	109	-	423	2	1	0	5.33	3160
415027	MLVYCA01	Mill Valley	Marin	3821	-	63,792	1	1	0	6.07	3621
858786	SNDGCA16	SNDG Mira Mesa	San Diego	5310	-	70,026	1	0	0	6.57	3903
559180	IVNHCA11	Ivanhoe	Tulare	441	-	193,296	3	2	0	5.05	2982
858770	RBRNCA11	Rancho Bernardo	San Diego	4178	-	187,328	1	0	0	6.57	3863
831102	BLCKCA11	Boulder Creek	San Diego	1051	-	106,508	2	1	0	7.00	4119
949722	CRDMCA11	Corona Del Mar	Orange	6350	51,244	132,880	1	1	0	4.93	3216
530428	AUBNCA01	Auburn Main	Placer	5789	-	172,598	2	1	0	7.45	4019
831112	KGCYCA11	King City	Monterey	1327	-	212,905	2	1	0	5.58	3242
530447	DTFLCA11	Alta Dutch Flats	Placer	538	-	43,835	4	2	0	8.25	4723
323641	LSANCA34	LSAN Angeles	Los Angeles	9593	8,133	374,465	1	1	0	7.60	4338
949808	RSMGCA11	R S Margarita	Orange	2003	-	28,744	1	0	0	6.27	5195
760742	HLVLA11	Holtville	Imperial	458	-	36,118	2	1	0	6.41	3387
707321	SBSTCA11	Sebastopol	Sonoma	2794	32,610	351,030	2	1	0	8.99	4995
530463	HMWDCA11	Homewood	El Dorado	1117	-	41,885	1	0	0	6.51	3502
707334	WLTSCA12	Willits	Mendocino	2049	-	302,155	2	1	0	10.44	6200
831106	CRVYCA11	Carmel Valley	Monterey	1039	-	61,473	2	1	0	5.26	3258
707303	LOLTCA11	Lolita	Humboldt	123	-	9,355	2	1	0	3.96	2451
323642	LSANCA35	LSAN Montebello	Los Angeles	7620	-	261,864	1	1	0	6.93	3749
707337	RTPKCA11	Rohnert Park	Sonoma	2121	-	72,712	1	0	0	9.72	5731
530481	NYUBCA11	North Yuba	Yuba	515	-	29,786	3	2	0	6.27	3534
916491	PLGVCA12	Pleasant Grove	Placer	160	-	20,645	4	2	0	6.34	3537
415075	SSLTCA11	Sausalito Larkspur	Marin	1737	-	17,833	1	1	0	5.81	3393
530522	WNTRCA11	Winters	Yolo	734	16,119	63,060	2	1	0	10.47	5081
949791	SJPCPA12	S J Capistrano	Orange	4048	-	35,832	1	1	0	6.06	4638
530521	WLWSCA11	Willows	Glenn	989	-	53,383	2	1	0	6.69	3850
415072	SNRFCA01	San Rafael Main	Marin	6998	-	172,731	1	1	0	8.36	4740
530460	GRNDCA13	Grenada	Siskiyou	81	-	3,010	2	1	0	4.49	2607
661351	AGDLCA11	Agua Dulce	Los Angeles	456	-	311,170	2	1	0	4.88	3410
760792	SNMCCA11	San Marcos	San Diego	4889	1,511	419,648	1	1	0	7.99	4290
408138	SNVACA01	Carrol Sunmyvale	Santa Clara	7759	6,195	147,584	1	1	0	6.99	3934
559157	CRTHCA11	Caruthers	Fresno	383	-	29,715	4	2	0	5.89	3415
209176	HERLCA11	Herald	Sacramento	273	-	62,776	3	2	0	7.75	3829
805354	ATSCCA11	Atascadero	San Luis Obispo	2312	-	169,359	1	1	0	4.40	2703
530514	THCYCA01	Tahoe City	Placer	2438	-	52,998	1	0	0	5.49	3194
805378	MRBACA11	Morro Bay	San Luis Obispo	993	-	86,371	1	1	0	4.24	2510
909773	RILTCA11	Rialto	San Bernardino	3898	-	381,712	2	1	0	6.08	3611
310618	HWTHCA01	Hawthorne	Los Angeles	5016	-	72,255	1	1	0	6.88	3868
559235	VISLCA11	Visalia Main	Tulare	6971	-	641,327	1	1	0	5.18	3328

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510001	ALBYCA11	Albany Solano	Alameda	6236	21,550	92,458	1	1	0	6.60	3776
530442	DAVSCA11	Davis	Yolo	4191	-	143,752	1	0	0	8.12	5100
714739	GRGYCA01	Euclid	Orange	6721	-	66,526	1	1	0	5.60	3346
650032	MTVMCA11	Mountain View	Santa Clara	7929	-	111,521	1	0	0	6.92	4004
858779	SNDGCA03	SNDG Linda Vista	San Diego	8083	-	330,520	1	0	0	7.38	4194
209204	NWMNCA12	Newman	Stanislaus	549	-	37,512	2	1	0	5.62	3217
530505	SRCYCA11	Sierra City	Sierra	430	-	10,677	2	1	0	7.16	4132
714797	SLVRCA11	Silverado	Orange	191	-	54,216	2	1	0	4.46	2808
415019	IGNCCA12	Ignacio	Marin	1539	-	17,718	1	0	0	7.30	3686
408137	SNITCA11	Santa Clara Bellomy	Santa Clara	8974	-	175,946	1	0	0	6.99	3904
510040	OKLDCA13	Oakland Mountain	Alameda	4550	-	55,130	1	0	0	6.17	3537
707275	ANGWCA11	Angwin	Napa	591	-	36,041	3	2	0	6.41	3580
805380	NIPMCA11	Nipomo	San Luis Obispo	999	-	88,020	1	1	0	3.94	2414
510004	BKLYCA01	Berkeley Bancroft	Alameda	8600	-	98,859	1	0	0	5.48	3336
530520	WTLDDCA12	Wheatland	Sutter	497	-	37,759	2	1	0	8.05	4185
408132	SNUSCA14	San Jose Foxworthy	Santa Clara	9411	151,565	564,078	1	1	0	6.90	4123
805387	PSBHCA11	Pismo Beach	San Luis Obispo	736	-	54,019	1	0	0	3.38	2247
707304	LWLKCA11	Lower Lake	Lake	1965	27,689	308,029	2	1	0	12.27	5874
805385	PSRBCA01	Paso Robles	San Luis Obispo	4945	6,585	551,732	1	1	0	3.99	2574
831125	SNZCA01	Santa Cruz	Santa Cruz	6297	-	112,232	1	1	0	5.98	3527
209222	SKTNCA12	Stockton Ashley	San Joaquin	1196	-	134,528	3	2	0	7.10	3876
310628	LSANCA07	LSAN Airport	Los Angeles	7220	-	19,121	1	0	0	6.02	3547
760758	OCSDCA11	Oceanside Mission	San Diego	4352	14,021	330,986	1	1	0	6.38	4415
707276	ARCTCA11	Arcata	Humboldt	1835	-	89,453	1	1	0	4.70	2847
415005	TBRNCA11	Tiburon	Marin	1886	-	3,569	1	0	0	6.88	3798
209182	JMTWCA11	Jamestown	Tuolumne	800	-	86,889	2	0	0	8.01	4374
760730	ELCNCA01	El Centro	Imperial	3848	2,151	156,017	1	1	0	6.01	3269
209192	ESCLCA11	Escalon	San Joaquin	929	-	32,958	2	1	0	8.89	4435
530515	TRUCCA11	Truckee	Nevada	3351	-	117,401	1	0	0	5.51	3248
805370	FLMRCA11	Fillmore	Ventura	791	-	58,884	1	1	0	4.14	3150
661371	FZPKCA11	Frazier Park	Kern	757	-	255,429	2	1	0	6.07	3593
530493	QNCYCA12	Quincy	Plumas	1838	-	132,862	2	1	0	6.10	3710
707318	STHNCA11	St Helena	Napa	2372	-	99,871	1	1	0	6.91	4221
530462	HMCYCA11	Hamilton City	Glenn	145	-	9,970	2	1	0	5.48	3171
760726	CYWLCA11	Coyote Wells	Imperial	46	-	1,680	2	1	0	4.92	2980
714737	FUTNCA01	Fullerton	Orange	8005	-	559,318	1	1	0	5.58	3377
760733	ESCNCA01	Escondido	San Diego	7483	-	988,311	1	1	0	6.47	3611
714788	SNANCA01	Bush	Orange	8268	-	182,223	1	1	0	5.09	3191
209218	SNRACA13	Sonora	Tuolumne	4857	-	412,432	2	1	0	8.98	4399
209181	JCSNCA01	Jackson	Amador	1451	-	102,215	1	1	0	8.13	3978
925077	SUNLCA11	Sunol	Alameda	191	-	44,606	2	1	0	4.84	2769
707282	CLSTCA11	Calistoga	Napa	1111	-	146,784	2	1	0	6.19	4438
310619	IGWDCA01	Inglewood	Los Angeles	5028	-	79,328	1	1	0	6.82	3778
831141	WTVLCA01	Watsonville	Santa Cruz	7582	48,755	199,766	1	1	0	6.33	3535
530473	MRDNCA11	Meridian	Sutter	150	-	5,420	2	1	0	8.58	4049

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratin (mins)
831135	SNLCCA11	San Lucas	Monterey	43	-	21,562	2	1	0	6.89	2976
661372	LAMTCA11	Lamont	Kern	719	-	103,911	2	1	0	3.40	2609
858768	POWYCA11	Poway Midland	San Diego	2729	-	76,457	1	0	0	6.60	3643
415033	NICSCA11	Nicasio	Marin	250	-	11,117	2	1	0	7.39	4283
323629	LSANCA08	LSAN Melrose	Los Angeles	11621	-	365,907	1	1	0	5.81	3345
209223	SKTNCA14	Stockton Redwood	San Joaquin	1471	-	102,554	1	1	0	7.13	3566
209179	IONECA11	Ione	Amador	874	-	112,159	2	1	0	7.82	4126
949706	BALBCA01	Balboa	Orange	2703	-	51,441	1	1	0	6.76	3335
530472	MYVICA01	Marysville	Yuba	3543	-	229,635	2	1	0	5.55	3666
323640	LSANCA29	LSAN Sunset	Los Angeles	5382	-	191,126	1	0	0	5.43	3045
510038	OKLDCA11	Oakland 45th Olympic	Alameda	9172	-	88,471	1	1	0	5.64	3225
760717	CRLSCA12	Carlsbad La Costa	San Diego	3662	-	62,771	1	0	0	6.48	3719
530483	ORLDCA11	Orland	Glenn	1400	-	91,937	2	1	0	5.91	3499
831103	BNLMCA11	Ben Lomond	Santa Cruz	579	-	33,465	2	0	0	8.70	4231
714710	BNPKCA11	Buena Park	Orange	4388	-	340,621	1	1	0	5.55	3311
949745	IRVNCA01	Irvine	Orange	4684	-	122,428	1	1	0	5.68	3370
707300	KLVLCA12	Kelseyville	Lake	1095	-	106,107	2	1	0	11.79	5239
714798	TUSTCA11	Tustin 11	Orange	6962	-	134,751	1	0	0	5.42	4820
661368	ERLMCA11	Earlmarl	Tulare	332	-	49,860	2	1	0	4.43	2962
707320	SNRSCA01	Santa Rosa Main	Sonoma	11549	-	734,403	1	1	0	10.11	7450
707310	NAPACA01	Napa	Napa	7620	-	444,116	1	1	0	7.96	8212
619795	SANTCA01	Santee	San Diego	2186	-	135,006	1	0	0	6.41	3919
209200	MDSTCA03	Modesto Kellogg South Ceres	Stanislaus	2635	-	196,478	2	1	0	7.44	3993
415069	SNGNCA11	San Geronimo	Marin	461	-	28,570	2	1	0	5.25	2928
510036	OKDLCA03	Oakland Franklin	Alameda	12884	-	153,386	1	0	0	4.99	3175
209232	TRLCCA11	Turlock	Stanislaus	6746	-	379,362	1	1	0	7.27	3947
209205	OKDLCA11	Oakdale	Stanislaus	2070	-	173,368	2	1	0	8.22	4166
530440	CRNGCA12	Corning	Tehama	1179	-	89,716	2	1	0	5.68	3394
209193	LSBNCA12	Los Banos	Merced	2068	-	157,287	2	1	0	6.63	3650
805396	TMTNCA11	Templeton	San Luis Obispo	643	-	49,354	1	0	0	4.95	2742
760712	CLXCCA12	Calexico	Imperial	1886	-	40,026	1	0	0	4.93	3220
323626	LSANCA05	LSAN Pleasant	Los Angeles	6868	5,382	232,270	2	1	0	5.64	3261
323631	LSANCA10	LSAN Webster	Los Angeles	9845	-	283,033	1	1	0	6.01	3473
909736	FNTACA11	Fontana	San Bernardino	5840	-	829,593	2	0	0	6.35	3754
310607	BVHLCA01	Beverly Hills	Los Angeles	16372	-	320,349	1	1	0	5.54	3176
805362	BYPKCA11	Baywood Park	Los Angeles	920	-	151,562	1	1	0	4.07	2584
559206	ORCVCA11	Orange Cove	Fresno	399	-	81,348	3	2	0	4.75	2618
530525	YBCYCA01	Yuba City Marysville	Sutter	4625	-	130,340	1	0	0	7.95	4803
661402	WASCCA01	Wasco	Kern	774	20,085	66,272	2	1	0	3.64	2568
323644	LSANCA56	LSAN Clinton	Los Angeles	6516	-	192,710	1	1	0	6.25	3477
530524	YREKCA11	Yreka	Siskiyou	1314	-	13,848	1	0	0	4.01	2875
209220	SKTNCA01	Stockton Main	San Joaquin	7703	-	489,989	2	1	0	6.45	3585
559175	HNFRCA01	Hanford	Kings	3748	-	381,264	2	1	0	5.51	3266
661367	DELNCA11	Delano	Tulare	1939	-	230,364	1	1	0	3.68	2513
530488	LVOKCA11	Live Oak	Sutter	672	48,637	31,160	2	1	0	7.16	4088

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duration (mins)
323643	LSANCA38	LSAN Republic	Los Angeles	6084	-	273,973	2	1	0	5.70	3158
559165	FRVLC A11	Farmersville	Tulare	401	-	27,801	2	1	0	3.98	2911
707323	SONMCA12	Sonoma	Sonoma	3961	-	230,651	1	1	0	32.80	12032
661405	LKLACA11	Lake Los Angeles	Los Angeles	427	-	43,680	1	1	0	4.18	2856
310663	WLANCA01	Century City	Los Angeles	5791	-	55,368	1	1	0	5.02	2886
323633	LSANCA12	Normandy	Los Angeles	9451	-	645,411	1	1	0	6.03	3401
831108	FETNCA11	Felton	Santa Cruz	976	-	26,254	2	1	0	7.72	3574
559246	GSHNCA11	Goshen	Tulare	730	-	26,113	2	1	0	4.53	2675
209214	RVRBCA11	Riverbank	Stanislaus	992	-	23,589	1	1	0	4.91	3234
951774	RVSDDA01	Riverside Orange	Riverside	7926	8,685	477,823	1	1	0	5.81	3301
559158	CHWCCA11	Chowchilla	Madera	963	-	166,189	2	1	0	5.35	2966
831110	GNZLCA11	Gonzales	Monterey	542	-	68,897	1	1	0	4.45	2548
310608	CLCYCA11	Culver City	Los Angeles	7964	-	277,935	1	1	0	5.40	2942
805391	SATCCA12	Saticoy	Ventura	1946	5,363	121,595	1	1	0	4.69	3541
707328	UKIHCA01	Ukiah Main	Mendocino	3947	17,349	316,473	1	1	0	9.12	5362
925012	DAVLCA12	Danville Main 12	Contra Costa	5110	-	303,232	1	0	0	4.47	2581
408139	SNVACA11	Mathilda Sunnevyale	Santa Clara	1662	-	15,573	1	0	0	7.06	3854
415023	LRKSCA11	Larkspur Corte Madera	Marin	3120	-	28,622	1	1	0	5.81	3221
916500	SCRMCA11	SCRM Gladstone	Sacramento	6152	-	129,853	1	1	0	6.58	3309
925042	ORNDCA11	Orinda	Contra Costa	1932	-	27,680	2	1	0	6.07	3216
707285	CBMTCA11	Cobb Mountain	Lake	317	-	77,134	2	1	0	11.53	5425
415064	SNFCCA13	SF Evergreen 9th Ave	San Francisco	9186	-	191,019	1	0	0	4.84	2814
661353	ARVNCA11	Arvin	Kern	736	-	146,034	2	1	0	3.09	2104
323636	LSANCA15	LSAN Axminster	Los Angeles	7990	-	337,619	2	1	0	5.26	3003
831100	APTS CA12	Aptos	Santa Cruz	2864	6,466	76,438	1	1	0	7.16	3855
559168	FRSNCA01	Fresno Main	Fresno	7618	8,285	783,227	2	1	0	4.67	2711
408129	SNUSCA11	San Jose White Rd	Santa Clara	8051	21,239	312,421	1	1	0	4.52	2789
951721	CORNCA11	Corona	Riverside	10738	12,733	1,015,536	1	1	0	4.40	2806
626660	SPSDCA11	Sout Pasadena Mission	Los Angeles	2834	-	29,159	1	0	0	4.91	2933
707286	CORRCA12	Cordelia	Solano	1340	-	51,378	1	0	0	6.95	3883
714809	YRLNCA12	Gypsum Canyon	Orange	562	-	34,901	0	0	0	5.21	3048
209199	MDSTCA02	Modesto Main	Stanislaus	11017	-	644,595	1	1	0	6.65	3723
661375	LTRKCA11	Little Rock	Los Angeles	969	-	326,765	3	2	0	3.57	2439
949806	MSVJCAAT	Mission Viejo	Orange	1889	-	4,533	1	0	0	5.22	3332
510070	SNLNCA11	San Leandro	Alameda	8284	-	212,461	1	1	0	8.79	4150
831116	SCVYCA01	Scotts Valley	Santa Cruz	1367	-	25,197	1	0	0	5.78	3153
714702	ANHMCA11	Anaheim Cypress	Orange	7686	-	719,465	1	1	0	4.61	2802
408143	SNTTCA01	Santa Clara Spacepark	Santa Clara	4768	-	86,502	1	0	0	6.66	3874
323635	LSANCA14	LSAN Adams	Los Angeles	3816	17,409	218,231	2	1	0	5.54	3568
559172	FRSNCA12	Fresno Clinton	Fresno	4088	-	273,821	2	1	0	5.61	3490
714759	ORNGCA11	Orange Chapman	Orange	6854	-	441,253	1	1	0	5.48	2956
415060	SNFCCA05	SF Mission 25th St	San Francisco	10082	10,859	247,554	1	0	0	4.99	2800
916536	FLSMCA14	Folsom Blue Ravine	Sacramento	1768	39,374	49,751	1	1	0	5.11	3141
949731	ELTRCA11	El Toro	Orange	10967	14,400	161,360	1	1	0	4.77	2940
925008	BTISCA11	Bethel Island	Contra Costa	265	-	21,915	3	2	0	2.26	1877

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duration (mins)
650056	SNCRCA11	San Carlos	San Mateo	6590	-	44,154	1	0	0	4.52	2711
209153	ATWRCA12	Atwater	Merced	1837	-	257,259	2	1	0	5.75	3204
310613	ELSGCA12	El Segundo Douglas	Los Angeles	4029	-	42,748	1	0	0	5.98	3272
530492	PTOLCA01	Portola	Plumas	982	-	19,236	1	0	0	3.54	2242
530506	SRVLC A11	Sierraville	Sierra	162	-	4,145	1	0	0	3.95	2099
818646	NHWDC A01	NHWD Lankershim	Los Angeles	6119	-	621,565	1	1	0	5.59	3075
951704	ARTNCA11	Arlington	Riverside	5896	-	477,090	1	0	0	5.60	3480
805352	ARGRCA12	Arroyo Grande	San Luis Obispo	3827	-	389,592	1	0	0	3.11	2198
530433	BLRSCA12	Blairsdien	Plumas	901	-	49,064	1	0	0	3.98	2452
415067	SNFCCA12	SF Larkin Steiner	San Francisco	22366	-	450,909	1	0	0	5.48	2959
714761	ORNGCA14	Orange West	Orange	3181	-	92,757	1	0	0	5.49	2937
831115	MTRYCA01	Monterey	Monterey	5760	-	172,928	1	0	0	4.80	2685
650071	SNMTCA11	San Mateo	San Mateo	7900	-	178,254	1	1	0	5.27	3041
562649	PRMTCA01	Paramount	Los Angeles	4428	-	228,130	2	1	0	5.17	3040
530477	NCLSCA12	Nicolaus	Sutter	98	-	26,112	4	2	0	5.77	3858
925029	MORGCA12	Moraga	Contra Costa	1735	-	74,237	1	1	0	5.56	2936
415076	STBHCA11	Stinson Beach	Marin	1202	-	33,640	2	1	0	4.39	2450
209221	SKTNCA11	Stockton Granite	San Joaquin	7644	-	635,162	1	0	0	5.98	3468
310664	WLMGCA01	Wilmington	Los Angeles	5429	7,678	370,114	1	1	0	5.05	3122
209248	MDSTCA05	Modesto Tally	Stanislaus	634	-	17,275	1	0	0	6.94	3157
661412	PLDLCA11	Palmdale East 47TH ST	Los Angeles	902	-	72,552	1	1	0	4.30	2562
530461	GRDLCA11	Gridley	Butte	797	-	43,743	2	1	0	5.79	3233
209187	LGRDCA11	Le Grande	Merced	178	-	43,320	2	1	0	5.19	2840
415059	SNFCCA04	SF Market McCoppin	San Francisco	10962	5,814	499,757	1	0	0	4.71	2907
916499	SCRMCA03	SCRM Garden	Sacramento	8642	31,091	487,675	1	1	0	5.70	3387
831140	TRPSCA11	Tres Pinos	San Benito	214	-	4,801	2	0	0	3.48	2937
818647	NHWDC A02	NHWD Magnolia	Los Angeles	12672	-	788,265	1	1	0	5.01	2908
661384	PLDLCA01	Palmdale	Los Angeles	4380	17,422	371,660	1	0	0	4.33	2976
530494	RDBLCA01	Red Bluff	Tehama	3745	123,883	121,506	2	1	0	6.28	3481
831105	CRMLCA11	Carmel Main	Monterey	4592	4,577	406,060	1	1	0	4.73	2775
559183	KGBGCA11	Kingsburg	Tulare	1028	-	74,271	2	1	0	4.98	2719
805399	VNTRCA11	Ventura Main Montalvo	Ventura	4798	6,318	295,151	1	0	0	7.96	4533
661388	RSMDCA11	Rosamond	Kern	1123	-	94,721	2	1	0	3.51	2313
626651	PSDNCA12	Pasadena Lake	Los Angeles	5609	-	164,318	1	0	0	5.00	2760
650053	RDCYCA01	Redwood City	San Mateo	7949	-	225,611	1	1	0	4.09	2604
661410	ACTNCA11	Acton	Los Angeles	743	-	122,841	2	1	0	4.46	3012
714805	TUSTCA70	Tustin 70	Orange	658	-	2,698	1	0	0	4.61	2736
916526	RILNCA12	Rio Linda	Sacramento	1163	-	45,247	2	1	0	7.07	3453
707330	HYVLC A12	Vacaville	Solano	5328	-	471,817	1	1	0	7.37	4350
707299	HVYLC A11	Humboldt	Humboldt	265	-	17,119	2	1	0	3.60	2319
925082	BSRNCA70	Bishop Ranch	Contra Costa	1443	-	20,613	0	0	0	4.33	2165
559217	SELMCA11	Selma	Fresno	1616	-	121,015	2	1	0	5.09	2872
925025	LVMRCA11	Livermore	Alameda	6279	-	489,137	1	0	0	4.05	2486
661358	BKFDCA13	Bakersfield Columbus	Kern	2365	-	439,850	1	1	0	3.59	2411
559170	FRSNCA13	Fresno Sierra	Fresno	6388	-	641,601	1	1	0	4.51	2760

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

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831127	SNUNCA11	San Juan Bautista	San Benito	384	-	7,077	2	1	0	3.24	2215
916470	LOWSCA11	Loomis	Placer	1397	-	115,392	1	1	0	4.54	2800
916482	ORVACA11	Orangevale	Sacramento	2287	39,700	90,970	1	1	0	5.49	3976
510002	ALMDCA11	Alameda Central	Alameda	6355	5,120	185,433	1	0	0	5.15	2815
714701	ANHMA01	Anaheim Lemon	Orange	7849	-	321,767	1	0	0	5.49	3105
818656	SHOKCA01	Sherman Oaks	Los Angeles	13316	-	602,971	1	1	0	4.87	2873
818662	VNNYCA02	Van Nuys	Los Angeles	10196	15,266	529,734	1	1	0	5.35	2868
559245	FRSNCA14	Fresno West Highway City	Fresno	3283	23,151	44,903	2	1	0	5.58	3574
949749	LNGGCA12	Wallace	Calaveras	400	80,144	335,224	2	1	0	5.16	2764
831113	MARNCA11	Laguna Niguel	Orange	3371	-	40,081	1	0	0	5.05	3139
805389	SNLOCA01	Marina	Monterey	1358	-	21,687	1	0	0	4.83	2836
209230	TRACCA11	San Luis Obispo	San Luis Obispo	4352	-	575,015	1	0	0	3.01	1943
559243	MADRCA12	Tracy	San Joaquin	4319	-	390,405	2	1	0	6.74	3771
916498	SCRMCA02	Madera Bonnadelli	Madera	369	11,948	52,283	3	2	0	4.54	2430
760743	IMPRCA11	SCRIM Ivanhoe	Sacramento	7391	-	250,936	1	1	0	6.00	3092
714811	ANHMCA17	Imperial	Imperial	559	-	19,900	1	0	0	4.71	3109
559164	DINBCA01	ANHM Hills	Orange	848	-	52,121	1	0	0	4.19	2626
530469	LSMLCA11	Dinuba	Tulare	1352	-	78,090	2	1	0	4.31	2651
408128	SNUSCA02	Los Molinos	Tehama	355	21,947	46,593	2	1	0	6.77	4038
559169	FRSNCA11	San Jose Main	Santa Clara	12910	-	253,953	1	0	0	4.02	2831
661394	SLMNCA11	Fresno Baldwin	Fresno	5377	-	275,888	2	1	0	5.13	2712
831126	SNZCA11	Santa Cruz Capitola	Los Angeles	3415	-	397,607	1	1	0	3.90	2983
707307	MKVLCA11	McKinleyville	Humboldt	4979	32,778	126,850	1	1	0	6.25	3186
818610	CNPKCA01	Canoga Park	Los Angeles	1103	9,736	46,892	1	0	0	4.08	2480
661357	BKFDCA12	Bakersfield Main Fairview	Kern	13344	16,043	1,356,631	1	1	0	4.01	2417
530486	PRDSCA11	Paradise Main	Butte	6158	-	1,338,241	1	1	0	3.24	2581
408145	SNUSCA21	San Jose Junction	Santa Clara	1089	-	76,534	1	1	0	4.29	2923
916454	FLSMCA13	Folsom El Dorado Hills	Sacramento	6140	-	44,129	0	0	0	3.56	2305
661407	SAGSCA11	Saugus	Los Angeles	2631	-	172,078	1	0	1	4.53	3113
707324	SUISCA11	Suisun City	Los Angeles	2528	-	245,186	1	1	1	3.95	2782
209227	THTNCA11	Thornton	Solano	345	-	11,330	0	0	1	4.29	2331
530517	VINACA12	Vina	San Joaquin	100	-	39,916	3	1	1	5.64	2824
408114	MLPSCA11	Milpitas	Tehama	69	-	10,211	2	1	1	3.14	1976
209196	MRCDA01	Merced	Santa Clara	5636	-	127,982	1	1	1	4.51	2713
714709	BREACA12	Brea	Merced	5298	-	562,718	1	1	1	5.95	3073
925074	SNRMCA11	San Ramon	Orange	2998	-	326,264	1	1	1	4.77	2895
714760	ORNGCA13	Orange Olive	Alameda	4197	-	169,531	0	0	1	3.99	3075
209211	PLNDCA11	Planada	Orange	5138	-	378,453	1	1	1	5.97	3430
831107	CSVLCA11	Castroville	Merced	279	-	37,551	2	1	1	5.55	2943
925081	CYTNCA11	Clayton	Monterey	1012	-	71,233	2	1	1	4.01	2276
661361	BKFDCA17	Bakersfield West Rosedale	Contra Costa	1502	-	307,839	1	1	1	6.71	4607
707290	FRFDCA01	Fairfield	Kern	3311	-	345,379	1	0	1	6.73	4089
916502	SCRMCA13	SCRIM Fruitridge	Sacramento	5082	32,398	127,645	1	1	1	5.57	3405
323634	LSANCA13	LSAN Plymouth	Los Angeles	5803	-	282,014	3	1	1	4.98	2858

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratn (mins)
916497	SCRMCA1R	Sequia Pacific State	Sacramento	6182	-	75,992	1	0	1	5.14	3023
310622	LOMTCOA11	Lomita	Los Angeles	5732	-	177,012	1	1	1	4.45	2627
661383	OLDLCA11	Export Olddale	Kern	2977	-	1,019,218	2	1	1	3.24	2278
831111	HLSSTCA11	Hollister	San Benito	2923	-	60,953	1	1	1	4.10	2562
925085	DAVLCA13	Danville Tassajara 13	Contra Costa	2391	-	53,030	0	0	1	3.81	2439
714789	SNANCA11	Bristol	Orange	9617	73,863	264,596	1	0	1	5.26	2948
510017	HYWRCA01	Hayward Main	Alameda	7870	-	125,529	1	0	1	5.56	3165
650006	BRLNCA01	Burlingame	San Mateo	7936	72,737	106,149	1	0	1	4.37	2530
209171	GALTCOA11	Galt	Sacramento	1448	-	95,444	1	1	1	5.49	2827
818652	RESDCA01	Reseda	Los Angeles	10038	19,900	602,866	1	1	1	4.02	2306
818621	LACRCA11	La Crescenta	Los Angeles	6224	-	402,615	1	1	1	4.03	2263
626650	PSDNCA11	Pasadena Mt Wilson Green	Los Angeles	12284	-	222,373	1	0	1	5.23	3042
650043	PCFCCA11	Pacifica	San Mateo	3023	-	49,646	1	1	1	4.09	2438
310659	SNPDCA01	San Pedro	Los Angeles	7437	-	403,536	1	1	1	4.76	2778
925007	BRWDCA12	Brentwood	Contra Costa	3696	-	129,956	1	0	1	3.20	2254
310615	GRDNCA01	Gardena	Los Angeles	11967	-	1,293,390	2	1	1	5.35	3370
707289	EURKCA01	Eureka	Humboldt	4799	-	127,638	1	0	1	4.00	2572
916501	SCRMCA12	SCRM Empire	Sacramento	4226	56,582	156,697	1	1	1	6.01	3264
916451	FROKCA11	Fair Oaks	Sacramento	7463	-	362,215	1	1	1	5.17	2829
661356	BKFDCA11	Bakersfield Empire	Kern	1142	-	501,216	2	1	1	3.38	2781
714767	PLNCA11	Placencia	Orange	5397	-	476,847	1	1	1	5.38	3361
661359	BKFDCA14	Bakersfield Temple	Kern	6893	-	1,678,481	2	1	1	3.12	2199
925047	PLTNCA12	Pleasanton Main Hopyard	Alameda	4045	-	207,817	1	0	1	3.57	2192
559247	FRSNCA15	Fresno Woodward	Fresno	1076	-	69,414	1	0	1	4.48	2539
707293	FTUNCA11	Fortuna	Humboldt	1102	-	38,148	1	0	1	2.96	2991
916478	NHLDCA11	Edgewood N Highl	Sacramento	4053	31,539	368,641	1	1	1	5.06	3054
714703	ANHMCA12	Anaheim La Palma	Orange	1791	-	194,078	1	0	1	4.59	2550
559207	ORSICA11	Orosi	Tulare	757	-	134,780	3	1	1	4.22	2698
213627	LSANCA06	Union	Los Angeles	4504	-	182,016	1	0	1	3.66	2180
831119	SLNSCA01	Salinas Main	Monterey	5792	-	110,870	1	0	1	4.04	2336
949810	IRVNCA12	Spectrum Irvine	Orange	1708	-	948	0	0	1	6.10	2867
925041	OKLYCA11	Oakley	Contra Costa	1105	-	26,657	1	1	1	8.02	2959
916479	NSCRCA11	Wabash	Sacramento	7088	95,277	412,604	1	0	1	5.41	2948
818648	NORGCA11	Northridge	Los Angeles	10424	37,683	986,797	1	1	1	3.97	3626
310609	CMTNCA01	Compton	Los Angeles	9969	51,395	1,171,795	2	1	1	4.16	3058
209201	MDSTCA04	Modesto Kingswood Curtis Salic Stanislaus	Los Angeles	1201	-	43,279	1	0	1	5.10	3175
661376	MOJVCA01	Mojave	Kern	581	-	71,609	2	1	1	3.01	1845
510018	HYWRCA11	Hayward Depot	Alameda	5286	-	143,013	1	0	1	5.32	2810
916467	LNCLCA11	Lincoln	Placer	840	-	85,884	1	1	1	3.08	2115
661379	NHLLCA01	Newhall	Los Angeles	5371	-	634,278	1	0	1	3.57	2601
661408	CSTCCA11	Castaic	Los Angeles	3431	-	201,094	1	0	1	3.56	2459
559159	CLVSCA11	Glovis	Fresno	8311	-	881,838	2	1	1	3.90	2445
949725	CSMSCA11	Costa Mesa	Orange	5737	19,168	178,369	1	0	1	4.80	2592
408133	SNUSCA15	San Jose Evergreen San Felipe	Santa Clara	5113	-	360,280	1	1	1	3.55	2799
916519	WSCRCA11	Frontier	Sacramento	3690	-	164,566	1	0	1	5.03	2706

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duration (mins)
831120	SLNSCA11	Hickory Salinas	Monterey	2176	-	47,742	1	0	1	4.18	2269
213630	LSANCA09	Richmond	Los Angeles	6015	-	335,031	1	0	1	4.39	2556
831117	SESDCA11	Seaside	Monterey	1845	-	54,451	1	0	1	4.52	2434
209191	LODICA01	Lodi	San Joaquin	5596	-	265,687	2	1	1	5.95	3077
650026	MLBRCA11	Millbrae	San Mateo	2613	-	38,267	1	0	1	3.89	2406
323616	HLWDCA01	Hollywood	Los Angeles	9481	-	530,927	1	0	1	4.08	2445
650055	SNBUCA02	San Bruno	San Mateo	9822	-	104,775	1	0	1	4.00	2595
805393	SIMICA11	Simi	Ventura	7815	-	1,643,216	1	0	1	3.67	2172
323655	SGATCA01	South Gate	Los Angeles	4611	-	543,039	2	1	1	11.07	3691
530480	NSJNCA11	North San Juan	Nevada	490	-	20,740	3	1	1	5.19	2720
925049	PSBGCA01	Pittsburg Main	Contra Costa	2490	-	253,899	1	1	1	3.87	2238
818605	BRBNCA11	Burbank Palm	Los Angeles	9868	-	671,797	1	0	1	4.09	2323
559194	MADRCA11	Madera Main	Madera	3987	21,845	685,245	2	1	1	4.00	2458
209190	LCFRCA11	Lockeford	San Joaquin	241	-	40,677	2	1	1	6.59	2996
714802	YRLNCA11	Yorba Linda	Orange	3299	-	348,775	1	0	1	4.58	2426
925030	MRTZCA11	Marinez	Contra Costa	3554	-	285,317	1	0	1	3.59	2291
510037	OKLDCA04	Oakland KelloggFruitvale	Alameda	5109	-	477,445	1	1	1	4.22	2943
916541	RCKLCA01	Stanford Ranch	Placer	3201	-	102,471	1	0	1	3.42	1891
408134	SNUSCA18	San Jose Almaden Valley	Santa Clara	2877	-	202,967	2	1	1	4.50	2693
310661	TRNCCA11	Torrance	Los Angeles	4260	-	220,986	1	1	1	4.79	2723
415048	PRSNCA11	Point Reyes	Marin	825	-	17,794	2	1	1	5.15	2690
831122	SLNSCA13	Hunter	Monterey	680	-	11,406	2	1	1	3.85	2065
916537	NSCRCA12	North Natomas	Sacramento	2047	-	72,922	0	0	1	3.91	2283
925022	LFYTCA11	Lafayette	Contra Costa	2283	-	38,824	1	0	1	3.43	2031
408142	SNUSCA22	San Jose Bailey	Santa Clara	149	-	25,850	2	1	1	4.47	1896
831144	ARMSCA11	Aromas	San Benito	446	-	52,895	2	1	1	2.97	1711
831123	SLNSCA14	Moro	Monterey	1095	-	48,454	2	1	1	4.20	2252
661409	BKFDCA19	Bakersfield Nomad	Kern	1972	-	123,092	1	0	1	3.49	3177
213632	LSANCA11	Rampart	Los Angeles	10841	-	413,279	1	0	1	4.35	2473
805377	MRPKCA12	Moorpark	Ventura	2457	-	1,218,522	1	0	1	3.12	2116
916533	RNMIRCA11	Rancho Murietta	Sacramento	523	-	20,188	1	0	1	2.85	3156
559166	FRBHCA11	Firebaugh	Fresno	604	-	63,246	1	1	1	4.81	2708
818614	GLDLCA11	Glendale	Los Angeles	14660	-	644,655	1	0	1	4.01	2113
415068	SNFCCA21	SF Folsom	San Francisco	7656	-	58,445	0	0	1	4.49	2338
408136	SNMACA11	San Martin	Santa Clara	632	-	81,065	2	1	1	3.72	2024
510014	FRMTCA11	Fremont Main 11	Alameda	7958	-	461,388	1	0	1	3.40	2209
530434	BCWYCA11	Brockway	Placer	924	-	23,972	0	0	1	6.34	2732
831121	SLNSCA12	Glennview	Monterey	556	-	8,556	1	0	1	4.42	2355
530444	DWNVCA11	Downieville	Sierra	239	-	8,963	2	1	1	4.81	2324
510039	OKLDCA12	Oakland Holly	Alameda	7805	-	389,792	1	1	1	4.62	2655
661369	EDWRCA01	Edwards	Kern	137	-	6,702	0	0	1	1.02	1037
925050	PSBGCA11	Pittsburg Bay Point Willow	Contra Costa	1095	-	48,373	1	0	1	3.77	2215
323604	BELCA11	Bell	Los Angeles	2449	-	214,911	1	0	1	4.98	2146
916453	FLSMCA12	Folsom Nimbus	Sacramento	1844	-	114,499	0	0	1	2.80	2560
925003	ANTCCA11	Antioch	Contra Costa	5049	-	383,040	1	0	1	3.63	2436

Table 7.19 SERVICE QUALITY METRICS IN GO 133-D \$9.7 "ALT INVESTMENTS" WIRE CENTERS (Sorted by Percent Cleared within 24 Hours) (cont'd)

WC	CLLI	WC Name	County	Jan 2019 Access Lines	GO 133-D \$9.7 "Alternative Investments"	Other Rehab Expenditures	OOS per 100 ALs per month	OOS>24 per 100 ALs per month	Pct Cleared w/in 24 hours (unadj)	# days to clear 90% OOS (unadj)	Avg OOS Duratn (mins)
925079	WNCKA11	Walnut Creek	Contra Costa	11153	22,950	506,532	1	0	1	4.32	2161
510078	UNCYCA11	Union City	Alameda	4821	-	300,413	1	0	1	3.24	2414
415020	INVRCA11	Inverness	Marin	447	-	16,784	3	0	1	3.53	2229
925009	CNCRCA01	Concord	Contra Costa	8980	-	332,450	1	0	1	3.51	2137
323617	HNPKCA01	Huntington Park	Los Angeles	6751	-	406,759	1	1	1	3.05	1822
925083	PLTNCA13	Pleasanton Hacienda	Alameda	1621	-	49,692	0	0	1	3.38	1699
951765	PDLYCA11	Pedley	Riverside	2466	27,450	435,505	1	0	1	3.19	1861
818600	AGORCA11	Agoura	Los Angeles	4858	-	951,226	1	0	1	4.38	5841
818665	CLBSCA50	Calabasas Los Virgenes	Los Angeles	1058	-	23,283	1	0	1	5.22	3035
510015	FRMTCA12	Fremont Adams Oliver 12	Alameda	6839	-	260,114	1	0	1	2.93	2367
650010	COLACA01	Colma Daly City	San Mateo	5878	39,715	159,553	1	0	1	2.86	1989
707331	VLLJCA01	Vallejo	Solano	6162	-	988,509	1	0	1	2.86	2205
559195	MNDTCA11	Mendota	Fresno	448	-	76,929	1	0	1	3.46	1831
213624	LSANCA02	Madison 02 MO	Los Angeles	7967	-	291,514	1	0	1	3.33	1788
530436	CMPVCA11	Camptonville	Yuba	216	-	19,650	6	2	1	3.82	2227
408131	SNUSCA13	San Jose Chynoweth	Santa Clara	7594	-	621,753	2	1	1	3.08	2007
707277	BNICCA11	Benicia	Solano	1943	-	185,031	1	0	1	2.98	1828
760707	BRSPCA11	Borrego Springs	San Diego	698	-	32,948	4	1	1	4.00	2147
559189	LEMRCAT12	Lemore Wymen	Kings	87	-	3,883	0	0	1	1.01	817
818606	BRBNCA13	Burbank Thornton	Los Angeles	755	-	6,093	#N/A	#N/A	#N/A	#N/A	#N/A
818666	CLBSCA11	Calabasas Park Sorrento	Los Angeles	3840	-	300,793	#N/A	#N/A	#N/A	#N/A	#N/A
707283	CLOKCA11	Clear Lake Oaks	Lake	536	-	19,221	#N/A	#N/A	#N/A	#N/A	#N/A
530532	GRVYCA11	Lake of the Pine	Nevada	1863	-	25,960	#N/A	#N/A	#N/A	#N/A	#N/A
530535	GRVYCA12	Wildwood	Nevada	1442	13,769	76,597	#N/A	#N/A	#N/A	#N/A	#N/A
949807	IRVNCA11	Irvine Airport	Orange	5656	-	31,116	#N/A	#N/A	#N/A	#N/A	#N/A
818620	LACNCA11	La Canada Oak Grove	Los Angeles	14	-	7,013	#N/A	#N/A	#N/A	#N/A	#N/A
213625	LSANCA03	Madison 03 MA	Los Angeles	5572	-	75,499	#N/A	#N/A	#N/A	#N/A	#N/A
209249	MDSTCA52	Modesto Davis	Stanislaus	18	-	1,268	#N/A	#N/A	#N/A	#N/A	#N/A
916527	RCKLCA11	Rocklin	Placer	1244	-	55,233	#N/A	#N/A	#N/A	#N/A	#N/A
916497	SCRMCA01	Sacramento Mn	Sacramento	6182	-	75,992	#N/A	#N/A	#N/A	#N/A	#N/A
916538	SCRMCA01	P Street State	Sacramento	#N/A	-	-	#N/A	#N/A	#N/A	#N/A	#N/A
916539	SCRMCA01	First Ave DMV State	Sacramento	#N/A	-	-	#N/A	#N/A	#N/A	#N/A	#N/A
714804	SNANCA12	Santa Ana West SNAN Bolsa	Orange	2806	16,598	74,071	#N/A	#N/A	#N/A	#N/A	#N/A
415061	SNFCCA06	SF Juniper Onondaga	San Francisco	11364	67,367	293,567	#N/A	#N/A	#N/A	#N/A	#N/A
415065	SNFCCA14	SF Montrose 19th	San Francisco	11765	-	232,590	#N/A	#N/A	#N/A	#N/A	#N/A
415066	SNFCCA17	SF Third St	San Mateo	4510	-	170,617	#N/A	#N/A	#N/A	#N/A	#N/A
415084	SNFCCA64	UC Hospital	San Francisco	#N/A	-	1,167	#N/A	#N/A	#N/A	#N/A	#N/A
707327	UKIHCA12	Capella Ivanhoe	Mendocino	995	-	97,224	#N/A	#N/A	#N/A	#N/A	#N/A

Summary and conclusions

Little has changed in the relationship between AT&T California and its parent AT&T Inc. over the 2018-19 period relative to where things stood in 2010-2017. As a relatively small – and increasingly less important – component of the massive AT&T Inc., AT&T California’s financial condition and investment policies are largely subject to the parent company’s control. The California ILEC entity has no independent ability to raise equity capital on its own and, at the moment, appears to have relatively limited debt on its books. Plant retirements and depreciation accruals have generally exceeded Gross Plant Additions on an annual basis, and the company’s net Telecommunications Plant in Service (TPIS) – roughly equivalent to what would be considered its “rate base” under rate-of-return regulation – has eroded to only about \$5-billion, resulting in a Net-to-Gross book value ratio of roughly 13.7%.

It is clear that AT&T California has continued its policy of *disinvesting* in its California local network infrastructure. Moreover, a large portion of AT&T California’s Gross Plant Additions continues to be directed toward expanding its ability to offer services like broadband Internet access and video, rather than core legacy circuit-switched POTS services.

There appears to be wide variation across all of AT&T California’s 615 wire centers as to the amount of new investment that has been directed at each of them, and ETI has not observed any specific pattern to explain this prioritization. There is no indication, for example, that investment dollars are being directed toward those wire centers that have been underperforming with respect to service quality or in their ability to meet the Commission’s GO 133-C/D service quality standards.

Notably, while the demand for AT&T California legacy POTS services have dropped by 76.4% over the 2010-2019 period, the company’s operating revenues saw only a 31.6% decrease relative to their 2010 level. One key explanation for this appears to be AT&T California’s policy of effecting significant price increases for its legacy residential POTS services almost every year since the CPUC’s adoption of the Uniform Regulatory Framework in 2006. AT&T California residential flat-rate (POTS) prices have risen by 152%, and for measured residential service, prices have jumped by 325%. These large and persistent price increases – coupled with the general deterioration in service quality as discussed in Chapter 4A – are entirely consistent with what appears to be a “harvesting strategy” with respect to legacy circuit-switched services.

“Harvesting” of this sort works where the price elasticity of demand is sufficiently low that persistent price increases will still be profitable. The fact that AT&T has been able to profitably implement this succession of annual rate increases for more than a decade since the de-tariffing of basic residential voice service raises serious questions as to whether competition has actually

developed to a point where continued regulatory protection of basic residential telephone service prices is no longer required or appropriate. In competitive markets, customers will normally respond to price increases by switching to substitute services or by purchasing less. Here, however, AT&T's "harvesting" strategy is founded on the expectation that, while *some* customers will discontinue their service in response to the steadily increasing prices, there are still a sufficiently large number of customers who confront few if any actual competitive alternatives and/or who simply retain their AT&T legacy POTS service due to inertia – they simply haven't gotten around to seeking out any alternatives.

Finally, and as we discussed in Chapter 4A, this same "harvesting" philosophy would also explain why AT&T has failed to improve service quality for its POTS services at least to the point where the GO 133-C/D standards can be achieved. Where customers have competitive alternatives, they will respond to inferior service by "voting with their feet" and seeking out alternative suppliers. But if the market is not so competitive that customers face such limited choices, the provider has little financial incentive to direct its financial and other resources in this area.



AT&T's "harvesting" philosophy explains why AT&T has failed to improve service quality for its POTS services at least to the point where the GO 133-C/D standards can be achieved, because the gains it can realize by raising prices and curtailing investment and maintenance far exceed any financial penalties it might suffer from persistently poor service quality.