

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 21R-0099T

IN THE MATTER OF THE PROPOSED RULES REGARDING THE IMPLEMENTATION OF HB 20-1293 AND THE 9-1-1 STATEWIDE SURCHARGE MECHANISM PURSUANT TO 4 CODE OF COLORADO REGULATIONS 723-2.

## INITIAL COMMENTS OF CTIA

CTIA<sup>1</sup> hereby provides its initial comments as directed by Decision No. C21-0118 (March 4, 2021), the Notice of Proposed Rulemaking opening this rulemaking proceeding (“NOPR”), regarding the Colorado Public Utilities Commission’s (“Commission’s”) implementation of HB 20-1293 relating to 9-1-1 services in the state of Colorado.<sup>2</sup>

CTIA appreciates the opportunity to participate in this proceeding. The NOPR proposes Commission rules to further the full implementation of HB20-1293, pertaining most specifically to resolving disputes regarding the collection, payment, remittance, and audit of the Emergency Telephone Charge and statewide 9-1-1 surcharge, and penalties for noncompliance with certain statutory provisions and Commission rules. NOPR at 4, ¶ 8. The NOPR observes that the

<sup>1</sup> CTIA – The Wireless Association® (“CTIA”) ([www.ctia.org](http://www.ctia.org)) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, and suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

<sup>2</sup> On July 10, 2020, the Governor signed HB 20-1293, which, among other things, requires the Commission to establish annually, by October 1 of each year: (1) the authorized threshold amount at which applications are required to increase the local Emergency Telephone Charge; (2) a statewide 9-1-1 surcharge; (3) a prepaid wireless 9-1-1 charge; and (4) formulas for distribution of money from the statewide 9-1-1 surcharge and prepaid wireless 9-1-1 charge to the governing bodies.

proposed rules are based on near-consensus rules developed in workshops led by Commission Staff. NOPR at 4, ¶¶ 8, 9. CTIA was not a participant in these workshops and appreciates the opportunity to review and comment on the proposed rules in the NOPR to ensure the final rules reflect broader industry consensus. Accordingly, at this time CTIA does not offer substantive comments on the proposed rules, but reserves the right to provide future comments based on its ongoing review of the proposed rules, or in response to initial comments submitted by other parties.

Dated: March 22, 2021

By: /s/ Philip J. Roselli

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March, 2021, the foregoing Initial Comments of CTIA were filed, and served by the Colorado Public Utilities Commission solely via its electronic filing system.

/s/ Philip J. Roselli

Philip J. Roselli