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September 5, 2025

Ms. Breanne Potter
Commission Secretary
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701-3109

Re: Application of AT&T Nevada for a Change in its Provider of Last Resort Service Area Pursuant to NRS 704.68886

Dear Ms. Potter:

Enclosed for filing is an application of Nevada Bell Telephone Company, LLC dba AT&T Nevada and AT&T Wholesale ("AT&T Nevada") for a Change in its Provider of Last Resort Service Area pursuant to NRS 704.68886.

Also enclosed as Exhibit 9 of the Application is a draft public notice pursuant to NAC 703.162.

If you have any questions concerning this matter, please let me know. I can be reached at (775) 527-4252.

Sincerely,

AT&T NEVADA

A handwritten signature in black ink, appearing to read "David Collier".

David A. Collier
Lead Regulatory Relations

Attachments

cc: Bureau of Consumer Protection (bcpserve@ag.nv.gov)
PUCN Staff Counsel (pucn.sc@puc.nv.gov)
Manny Lopez (lopez@puc.nv.gov)

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Application of Nevada Bell Telephone)
Company LLC d/b/a AT&T Nevada and) Docket No. 25-_____
AT&T Wholesale for a Change in its)
Provider of Last Resort Service Area)
Pursuant to NRS 704.68886.)
_____)

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Lead, Regulatory Relations
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dc1787@att.com

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1 Mineral, Nye, Pershing, Washoe, and White Pine counties.¹ Relief is sought under NRS
2 704.68886 on the basis that two or more providers that utilize satellite technology are capable
3 of providing alternative voice services to AT&T Nevada's remaining POLR areas.

4 As described in detail below, this Application meets all the necessary requirements of
5 NRS 704.68886 by demonstrating 1) the presence of multiple satellite providers capable of
6 providing alternative voice service in the POLR areas where AT&T Nevada seeks relief
7 pursuant to NRS 704.68886(1)(b), 2) coverage maps that provide accurate and sufficient detail
8 to identify the exact boundaries of the POLR area at issue herein pursuant to NRS
9 704.68886(2), and 3) timely distribution of required notifications to affected customers and
10 applicable public safety answering points under NRS 704.68886(4). This filing shows ample
11 grounds for approving this Application once all required meetings as set forth in NRS
12 704.68886(6) and duly noticed consumer sessions required under NRS 704.68886(7) are
13 completed.
14

15 This Application seeks POLR relief across all remaining exchange areas in which
16 AT&T Nevada has POLR obligations. This docket will not involve the discontinuance of
17 basic network service for any customer served by AT&T Nevada. Service to AT&T Nevada's
18 existing customers will not be impacted by this POLR relief request.

19 **III. NRS 704.68886 provides AT&T Nevada with a clear Pathway for Eliminating**
20 **existing POLR Designation and Obligations in those Areas served by at least Two**
21 **Providers utilizing Satellite Technology that offer Alternative Voice Service.**

22 Effective October 1, 2025, NRS 704.68886(1) will state that an application for relief
23 from obligations and status as a POLR is appropriate where alternative voice service is
24

25 ¹ The impacted exchanges include Austin, Baker, Battle Mountain, Crescent Valley, Duckwater/Currant/Nyala,
Empire, Gabbs, Eureka/Diamond Valley, Imlay, Lund, McGill and Spring Valley/Cherry Creek/Curry/Lages.

provided by:

- (b) ..., two or more providers that utilize a wireless or satellite technology and that are capable of providing alternative voice service to the entire area for which relief is sought.

At NRS 704.68886(15), “alternative voice service” is defined as:

- (a) ... a retail voice service made available through any technology or service arrangement that provides:
- (1) Voice-grade access to the public switched telephone network; and
 - (2) Access to emergency 911 service.

AT&T Nevada has previously sought and was granted tailored relief from POLR designation under NRS 704.68886(1)(b). On August 31, 2016, the Public Utilities Commission of Nevada (“Commission”) granted POLR relief in several areas of its exchange boundaries across seventeen counties by approving a stipulation between AT&T Nevada and Staff.² On November 13, 2024, the Commission granted POLR relief in portions of Lander and White Pine Counties.³

In both dockets, AT&T met all the necessary requirements of NRS 704.68886(1)(b) by demonstrating the presence of at least one facilities-based wireless provider combined with one reseller of the facilities-based wireless coverage. CPCN 616, Sub 29, issued on December 3, 2024, reflects maps and legal descriptions of AT&T Nevada’s existing POLR

² See Docket No. 16-03021 for the Commission Order partially relieving AT&T Nevada of its POLR obligations in Elko, Lander, Humboldt, Pershing, Storey, Lyon, Carson, Douglas, Esmeralda, Mineral, Churchill, Washoe, Clark, Nye, Lincoln, White Pine, and Eureka Counties at pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2015_THRU_PRESENT/2016-3/14857.pdf.

³ See Docket No. 24-08001 for Commission Order at [https://urldefense.com/v3/https://ecms.nv.gov/puc/#!/BhdT!mVcRQjrN90kgSSaW3UAZ_3HQZzhFyDHrf tLM2VH_3LXZ_IFgDLV5SeTa8fNI5cqbW7RIHe46r00gsKHqlfhbdtz\\$](https://urldefense.com/v3/https://ecms.nv.gov/puc/#!/BhdT!mVcRQjrN90kgSSaW3UAZ_3HQZzhFyDHrf tLM2VH_3LXZ_IFgDLV5SeTa8fNI5cqbW7RIHe46r00gsKHqlfhbdtz$).

1 service areas.⁴ Since 2016, AT&T has been granted full POLR relief in eleven of the
2 seventeen counties and partial relief in the remaining six counties.⁵

3 **IV. Multiple Satellite Providers Serve the Areas in which AT&T seeks POLR Relief.**

4 **A. The FCC’s National Broadband Map’s (“FCC Map”) data identify**
5 **availability of Fixed Broadband Service via Satellite Technology across the**
6 **United States.**

7 The FCC’s public-facing map⁶ and downloadable datasets include satellite broadband
8 availability, as reported by Internet Service Providers (ISPs) through its Broadband Data
9 Collection (“BDC”) system. In accordance with BDC’s data specifications, internet service
10 providers utilizing satellite technology biannually submit and certify service availability data
11 at fixed locations.⁷

12 Unlike wireless broadband service that is displayed on the FCC’s Mobile Broadband
13 Map across providers’ entire coverage area, the FCC’s Fixed Broadband Map (“FCC Fixed
14 Map”) displays satellite broadband coverage in only Broadband Serviceable Locations
15 (“BSLs”). What constitutes a Broadband Serviceable Location (BSL) is defined by the FCC’s
16 designated vendor, CostQuest, and is described as areas with business or residential structures
17 that either currently receive or are capable of receiving mass-market broadband internet
18

19 ⁴ See [https://urldefense.com/v3/https://ecms.nv.gov/puc/;!!BhdT!kYf8T8lrSQBP-O4PwtWJ8rj_fky0ca-yjXxAcVGWey-eyEUwxXvsffppSb8ckEhve6GgXsNESotrT35psQ\\$](https://urldefense.com/v3/https://ecms.nv.gov/puc/;!!BhdT!kYf8T8lrSQBP-O4PwtWJ8rj_fky0ca-yjXxAcVGWey-eyEUwxXvsffppSb8ckEhve6GgXsNESotrT35psQ$).

20 ⁵ In addition to the above referenced orders, the Commission granted AT&T Nevada’s requests for POLR relief
21 outside its exchange area boundaries. See Docket No. 20-10003
22 https://pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2020_THRU_PRESENT/2020-10/7567.pdf, Docket No.
23 22-03034 https://pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2020_THRU_PRESENT/2022-3/19517.pdf
and Docket No. 23-09027
<https://ecms.nv.gov/puc/api/Document/AQE6fwY1QWdPVCpm36TJCrY6vvK1J0n%C3%89J4C4xxKnen%C3%81spVtyThjTNMkL%C3%81Gpbd7ecnMYTepN9EVaIV1Fm9aOUVs8%3D/?OverlayMode=View>.

24 ⁶ See <https://broadbandmap.fcc.gov>.

25 ⁷ See Data Specifications for Biannual Submission of Subscription, Availability, and Supporting Data at bdc-availability-data-specifications.pdf.

1 service.⁸ The definition of BSL excludes land uses involving parcels that lack habitable
2 structures, secondary structures such as garages/sheds, buildings subscribing to enterprise-
3 grade broadband (e.g., corporate campuses, warehouses), schools/libraries, temporary or non-
4 residential structures, and recreational vehicles.

5 As a result, the FCC Fixed Map identifies low earth orbit and geostationary satellite
6 broadband service only in locations that generally contain traditional residential or business
7 structures and does not provide coverage information for rural areas that are unpopulated or
8 lack traditional residences or commercial buildings.

9 **B. Satellite Provider Maps serve as an alternate source for identifying Provider**
10 **Coverage in areas outside FCC's Broadband Serviceable Locations.**

11 Consumers can check satellite broadband service availability at a location by visiting
12 the provider's coverage map and entering a specific address. Satellite provider coverage maps
13 are reliable sources for identifying broadband access in outlying locations and low-density
14 regions that would not meet the FCC's definition of a BSL.

15 AT&T Nevada's remaining POLR areas are primarily located in the state's most rural
16 regions, many of which lack residential or commercial infrastructure. As such, the FCC Fixed
17 Map cannot confirm the presence or absence of broadband service for a significant portion of
18 AT&T Nevada's POLR area, as it does not collect data outside of BSLs. Accordingly,
19 provider coverage maps serve as a more effective and accurate tool for verifying service
20 availability in the remote areas that are the subject of this Application.
21
22
23

24 ⁸ See [https://help.bdc.fcc.gov/hc/en-us/articles/16842264428059-About-the-Fabric-What-a-Broadband-](https://help.bdc.fcc.gov/hc/en-us/articles/16842264428059-About-the-Fabric-What-a-Broadband-Serviceable-Location-BSL-Is-and-Is-Not)
25 [Serviceable-Location-BSL-Is-and-Is-Not](https://help.bdc.fcc.gov/hc/en-us/articles/16842264428059-About-the-Fabric-What-a-Broadband-Serviceable-Location-BSL-Is-and-Is-Not)

1 **C. Attached to AT&T Nevada’s Application are fifty-two maps illustrating its**
2 **POLR areas overlayed with the FCC Fixed Map’s service availability and**
3 **Satellite Providers’ coverage maps.**

4 **Exhibits 1-4** include maps of AT&T Nevada’s POLR areas, from statewide to street
5 level. **Exhibit 5** demonstrates access to alternative voice services powered by satellite
6 technology based on a) satellite broadband coverage data from the FCC Fixed Map, which is
7 broken down by provider and technology type, and b) broadband service information available
8 on coverage maps accessible on satellite provider websites. In compliance with NRS
9 704.68886(2)(a), the attached maps cover the entire area for which relief is sought and depicts
10 availability of alternative voice service as defined under NRS 704.68886(15):⁹

- 11 **Exhibit 1.** Map of POLR areas at a statewide level;
12 **Exhibit 2.** Maps of POLR areas at the county level;
13 **Exhibit 3.** Street level maps of POLR areas at scale of 1:288,000;
14 **Exhibit 4.** Street level maps of POLR areas at scale of 1:72,000; and
15 **Exhibit 5** Coverage maps of alternative voice service in AT&T Nevada’s POLR
16 areas.

17 **D. Exhibit 5 identifies two satellite providers AT&T Nevada relies on to satisfy**
18 **the standard under NRS 704.68886(1)(b).**

19 This Application is based on the presence of alternative voice services provisioned by
20 and/or through at least two providers of satellite technology. Voice services supported by the
21 below satellite providers are available across their entire coverage areas and offer access to
22 emergency 911 and the public switched telephone network.. **Exhibit 5** identifies two satellite
23

24 ⁹ The Declaration of Ty Shalley, attached as **Exhibit 6**, describes how a) the FCC Fixed Map data was used to map
25 available satellite coverage in the subject POLR areas, b) satellite maps were used to supplement coverage
information, and c) verifies the accuracy of the mapping data used in this Application.

providers¹⁰ capable of provisioning/supporting alternative voice service as defined in NRS 704.68886(15)(a) for all areas that are the subject of this Application:

- 1) Hughesnet Voice¹¹
- 2) Space Exploration Technologies Corp. (“Starlink”),¹² with subscription to a third-party VoIP application, such as Ooma Telo, magicJack, and AX Voice

Each map in **Exhibit 5** overlays FCC Fixed Map data, using 180-acre hexagonal grids, to show satellite availability across BSLs, and shaded areas to illustrate service access based on information from Hughesnet¹³ and Starlink¹⁴ websites. The resulting coverage maps demonstrate that all POLR areas at issue in this application are serviced by at least two satellite providers.

AT&T Nevada POLR areas can also access alternative voice service with Viasat Voice.¹⁵ The FCC Fixed Map confirms that Viasat offers satellite broadband service across all BSLs within the subject POLR areas.¹⁶ Moreover, Viasat’s coverage map indicates that all six

¹⁰ These providers are registered with the FCC and hold multiple authorizations for satellite operations and services.

¹¹ Hughes Network Systems, LLC (“Hughesnet”), FCC Registration No. 0016202228

¹² SpaceX Services, Inc., which operates the Starlink system, FCC Registration No. 0029602463

¹³ See coverage map at <https://www.hughesnet.com/availability/>.

¹⁴ See coverage map at https://www.starlink.com/us/map?srsId=AfmBOop2VCXNwn1eR6HeOitGEwJghLp-yaEzZwk0oaDFnn_dnyliXxx.

¹⁵ Viasat Carrier Services, Inc. (“Viasat”) FCC Registration No. 143051764

¹⁶ See cartographic depiction of broadband coverage for Viasat, Hughesnet, and Starlink in the following counties: Lander residential https://broadbandmap.fcc.gov/area-summary/fixed?version=dec2024&geoid=32015&type=county&zoom=7.37&vlon=-117.196691&vlat=40.053647&br=r&speed=0_0&tech=4_5 and business https://broadbandmap.fcc.gov/area-summary/fixed?version=dec2024&geoid=32015&type=county&zoom=7.52&vlon=-117.197115&vlat=40.058442&br=b&speed=0_0&tech=4_5; Mineral residential https://broadbandmap.fcc.gov/area-summary/fixed?version=dec2024&geoid=32021&type=county&zoom=8.09&vlon=-118.423293&vlat=38.486891&br=r&speed=0_0&tech=4_5 and business https://broadbandmap.fcc.gov/area-summary/fixed?version=dec2024&geoid=32021&type=county&zoom=8.09&vlon=-118.423293&vlat=38.486891&br=b&speed=0_0&tech=4_5; Nye residential https://broadbandmap.fcc.gov/area-summary/fixed?version=dec2024&geoid=32023&type=county&zoom=6.67&vlon=-116.462795&vlat=37.949542&br=r&speed=0_0&tech=4_5 and business https://broadbandmap.fcc.gov/area-summary/fixed?version=dec2024&geoid=32023&type=county&zoom=6.67&vlon=-116.462795&vlat=37.949542&br=b&speed=0_0&tech=4_5

1 AT&T Nevada's notice being sent to the PSAPs located in Lander, Mineral, Washoe, Nye,
2 Pershing, and White Pine counties. This notice is being mailed on September 5, 2025.

3 NAC 703.162 requires the applicant to file a draft public notice with its Application,
4 that includes information about its filing and a description of the relief being requested.
5 Attached as **Exhibit 9** is AT&T Nevada's draft notice.

6 **B. Consumer Sessions**

7 NRS 704.68886(7) requires the applicant, in collaboration with the Commission, to
8 schedule and conduct at least one consumer session in each county in which applicant seeks
9 relief. AT&T Nevada will work with the Commission to schedule and conduct public
10 meetings in Lander, Washoe, Nye, Pershing, and White Pine counties within 120 days of
11 filing this Application.

12 AT&T Nevada does not provide basic network service to any customer in the POLR
13 areas in Mineral County. Given that no customer is impacted by this Application in Mineral
14 County, the Commission may dispense with the consumer session required by NRS
15 704.68886(7) for this county.

17 **C. Meetings with Government Representatives and Consumer Advocates**

18 NRS 704.68886(6) specifies the category of government/agency representatives and
19 consumer advocates the applicant must meet with concerning this docket. AT&T Nevada
20 plans to meet with Commission Staff and the Bureau of Consumer Protection in September
21 and is reaching out to meet with representatives from the following agencies within 30 days
22 of filing this Application:

- 23 1) PSAPs whose jurisdictions include Lander, Mineral, Washoe, Nye, Pershing, and
24 White Pine counties.

2) Local law enforcement whose jurisdictions include Lander, Mineral, Washoe, Nye, Pershing, and White Pine counties.

VI. CONCLUSION

This Application meets all the requirements of NRS 704.68886, and AT&T Nevada is entitled to relief from its designation as a POLR in the areas identified in this Application.

AT&T Nevada respectfully asks the Commission to approve this Application upon completion of all required meetings as set forth in NRS 704.68886(6) and duly-noticed consumer sessions required by NRS 704.68886(7) on the basis that it has satisfied the requirements of NRS 704.68886 by demonstrating that there are at least two providers that utilize a satellite technology and are capable of providing alternative voice service throughout the entire area for which relief is sought. AT&T Nevada's POLR designation should be removed from all areas that are the subject of this Application, which will eliminate AT&T Nevada's remaining POLR obligations in the state.

Respectfully submitted this 5th day of September, 2025.

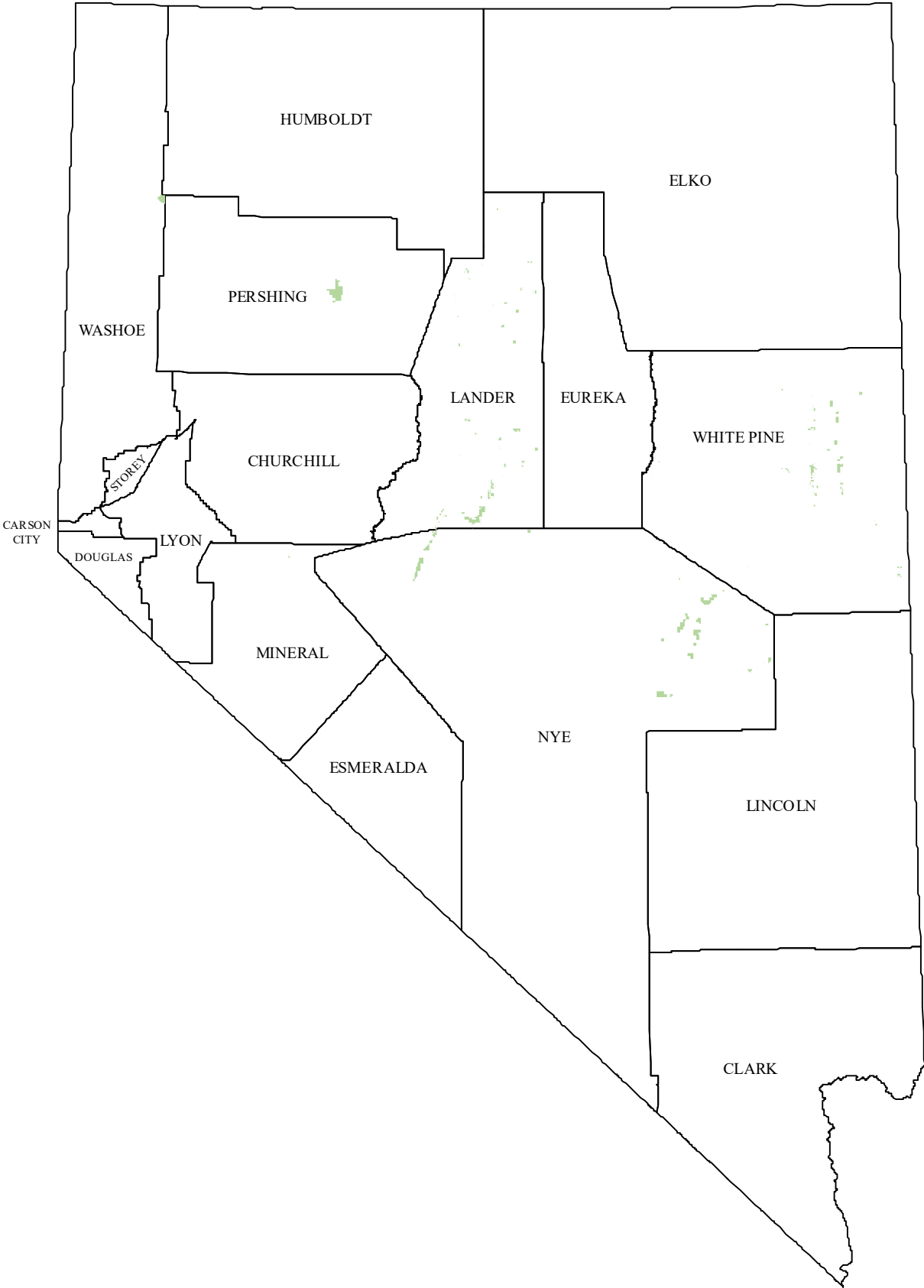
By:

An 1/2 hr


Anna Kapetanakos
AVP - Senior Legal Counsel
AT&T Nevada
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El Segundo, CA 90245-4518
(415) 694-1530
ak6252@att.com


Exhibit 1


Map of POLR areas at a Statewide Level




Legend

 PLR Area Seeking Relief

 County Boundaries




Scale = 1:3,500,000



0 10 20 40 Miles

Map prepared August, 2025

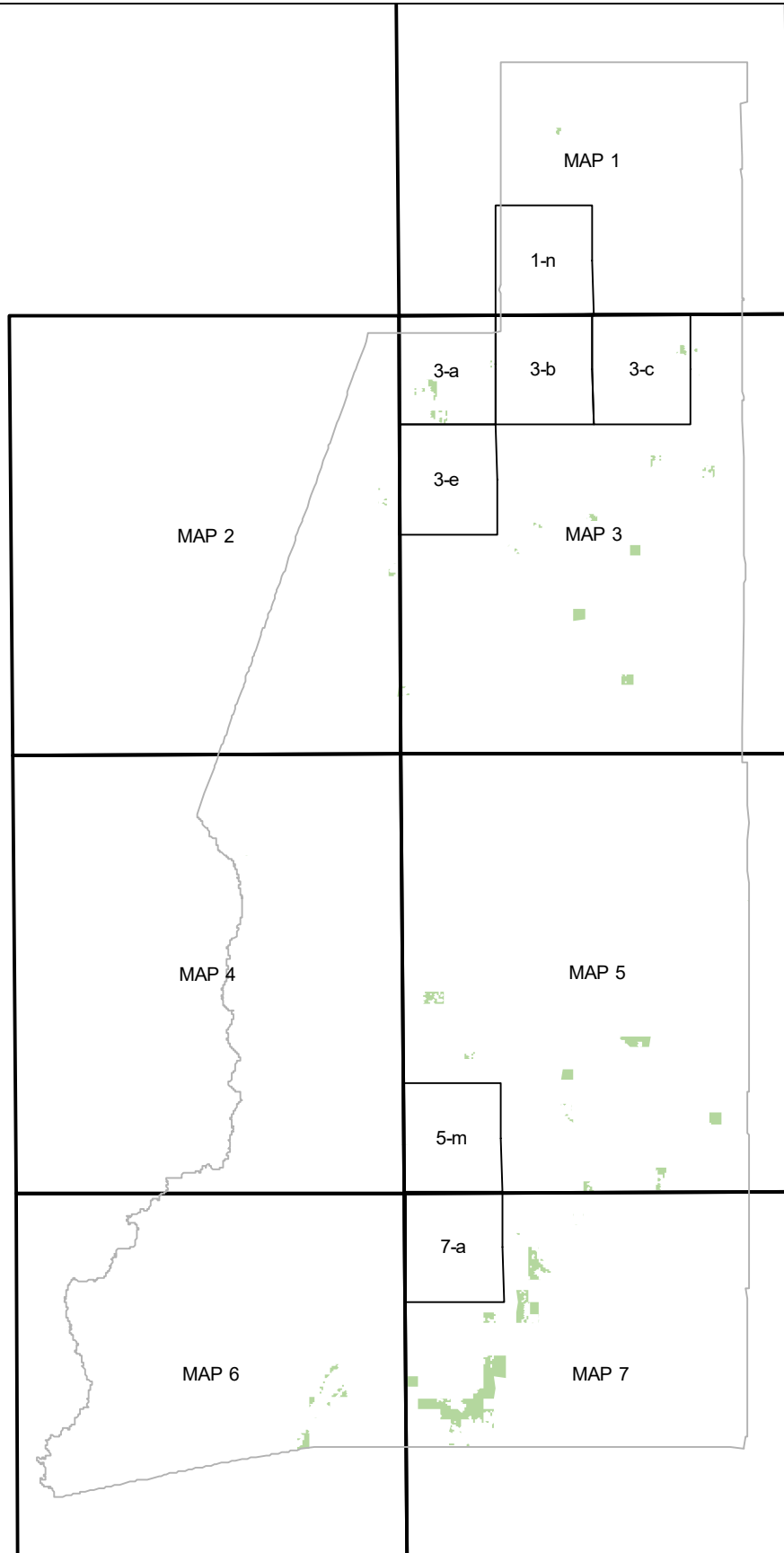


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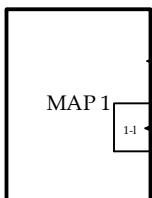
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Exhibit 2

Map of POLR areas at the County Level



Legend



DETAIL MAPS

1:288,000 Scale Map
-Ex: "MAP 1"

1:72,000 Scale Map
-Ex: "1-n"



PLR Area Seeking Relief



County Boundary



Scale = 1:1,000,000

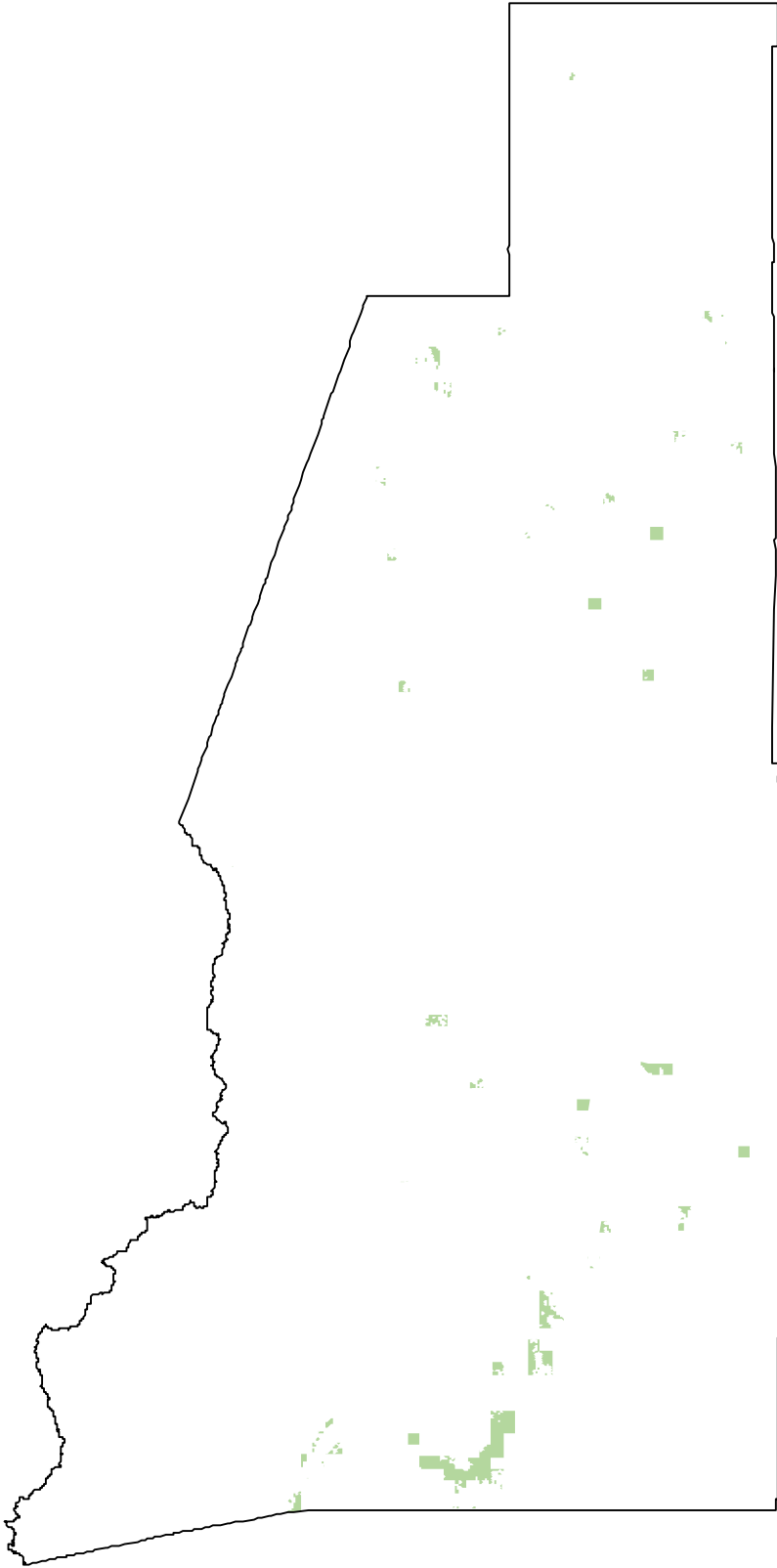
0 2.5 5 10 15 Miles

Map prepared August, 2025



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Legend



PLR Area Seeking Relief



County Boundary



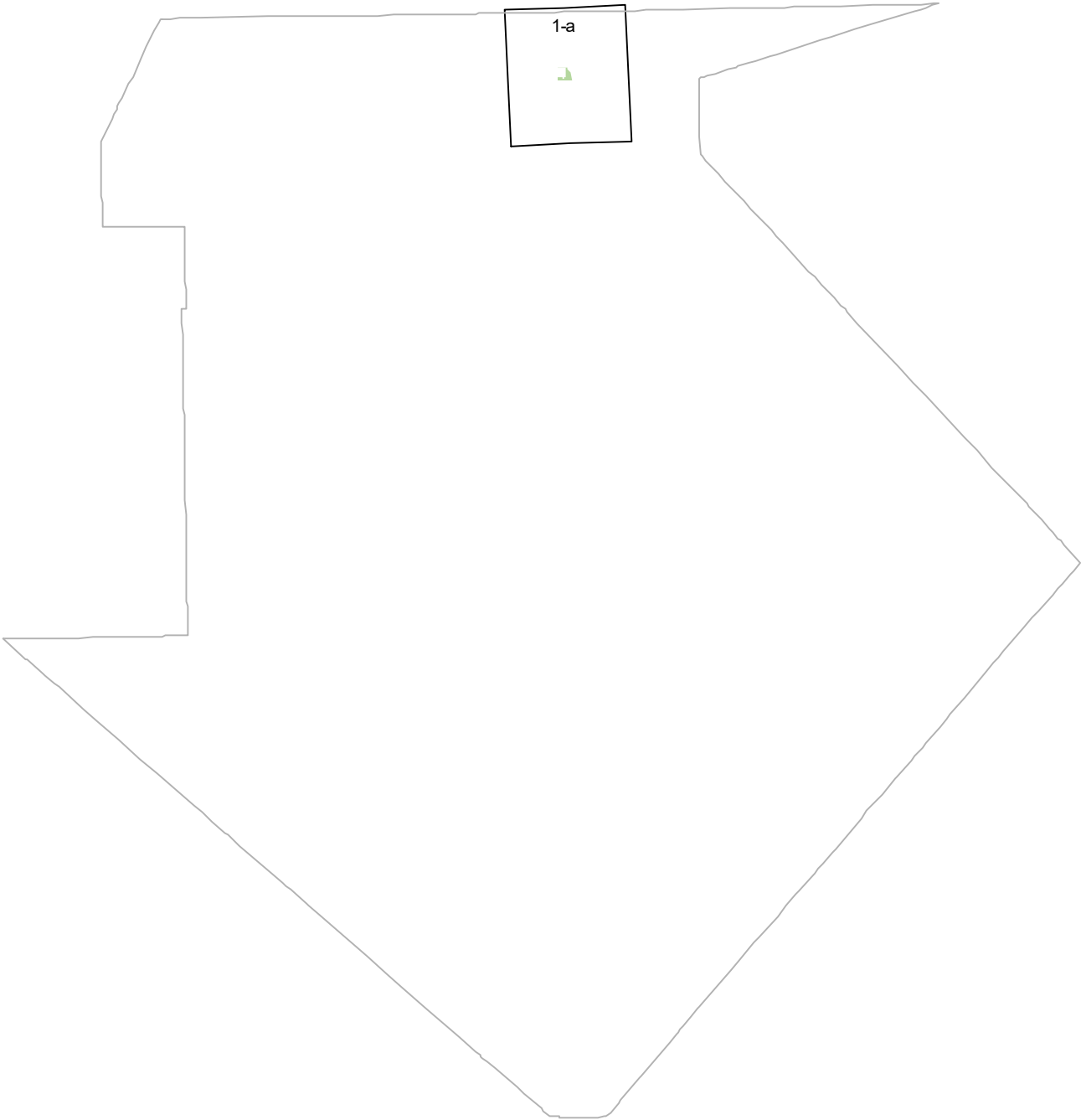
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Map prepared August, 2025



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Legend

MAP 1

1-a

DETAIL MAPS

1:288,000 Scale Map

-Ex: "MAP 1"

1:72,000 Scale Map

-Ex: "1-a"

PLR Area Seeking Relief

County Boundary

N

Scale = 1:750,000

0 5 10 20 Miles

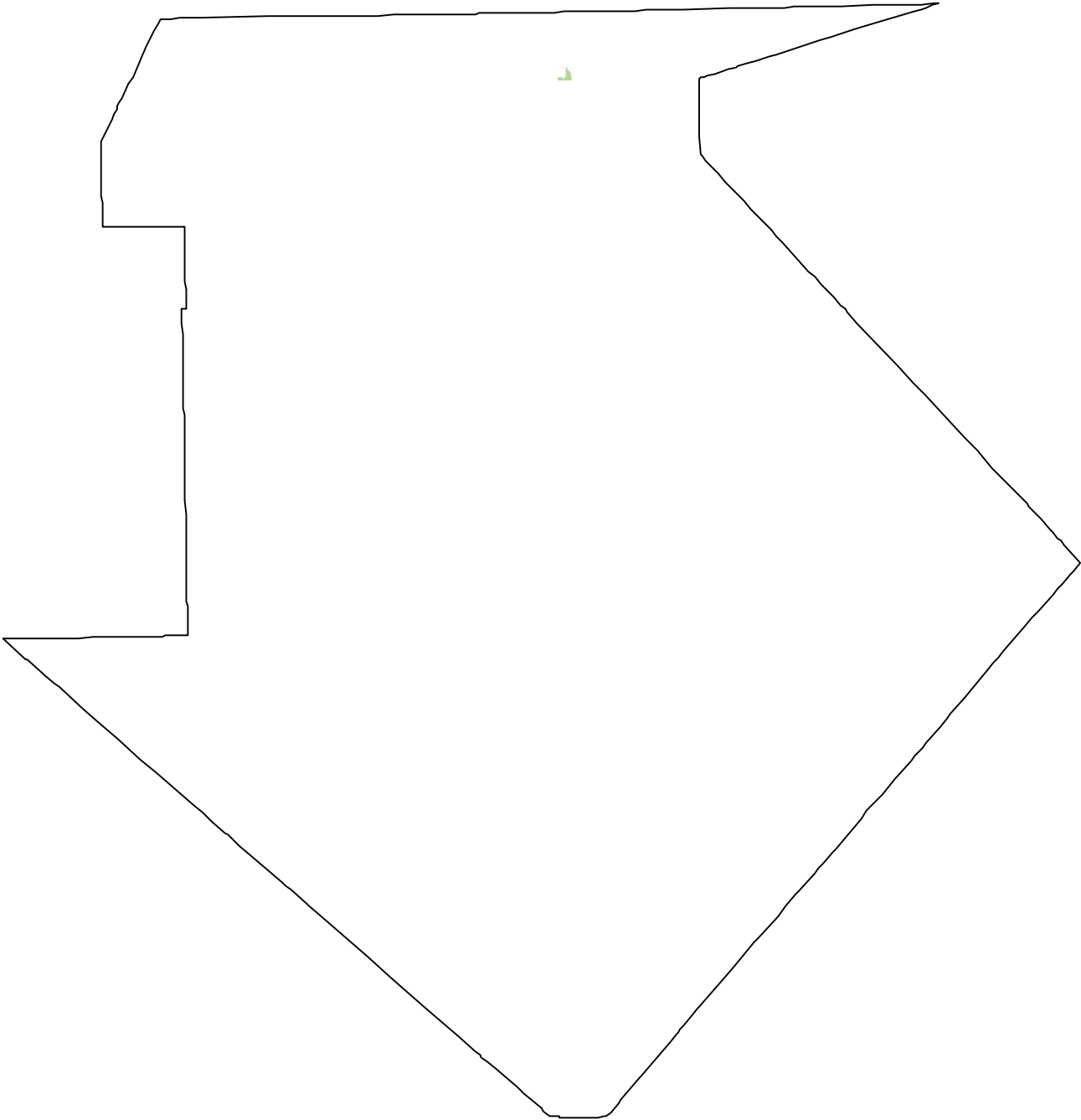
Map prepared August, 2025

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PLR Area Seeking Relief

County Boundary

N

Scale = 1:750,000

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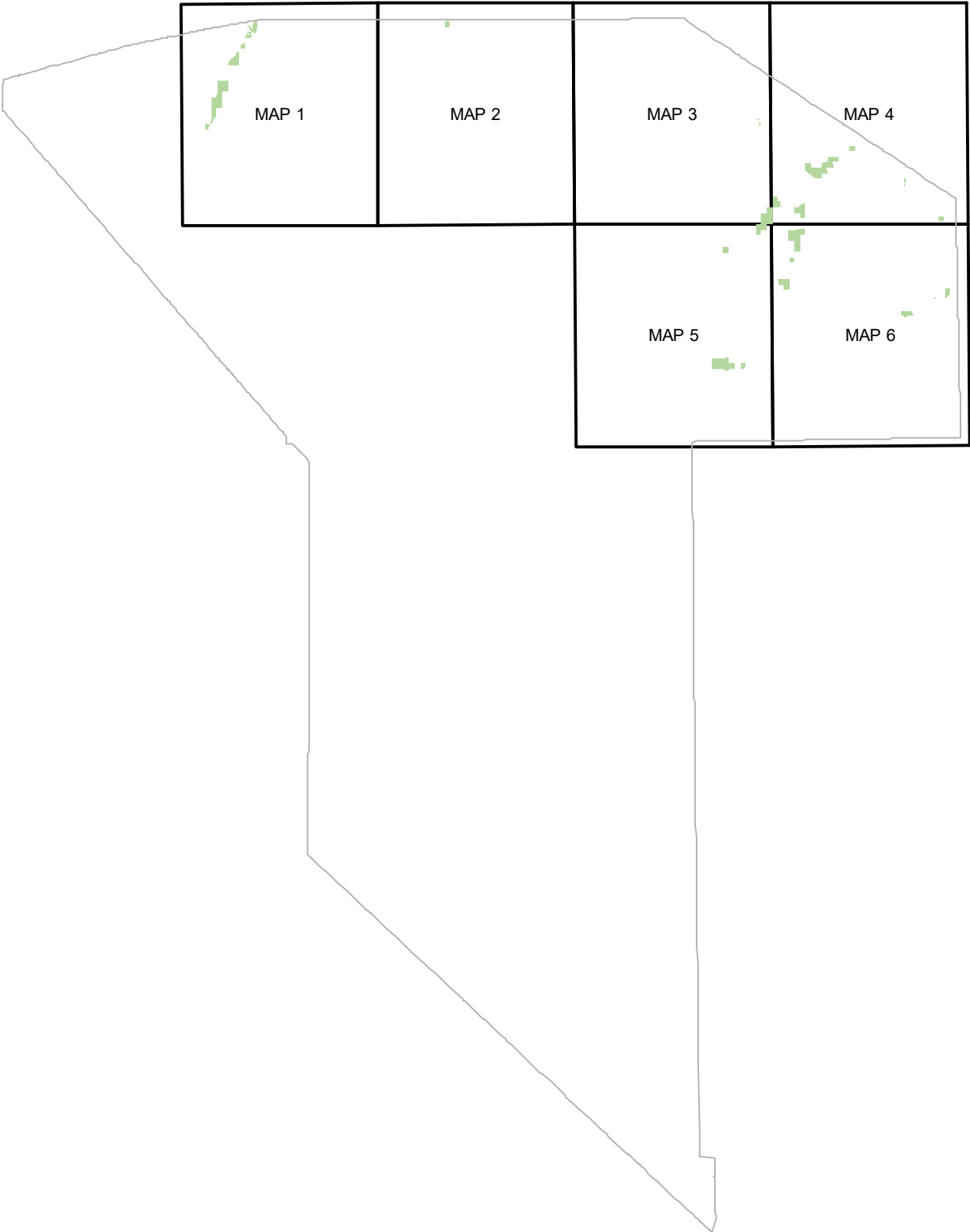
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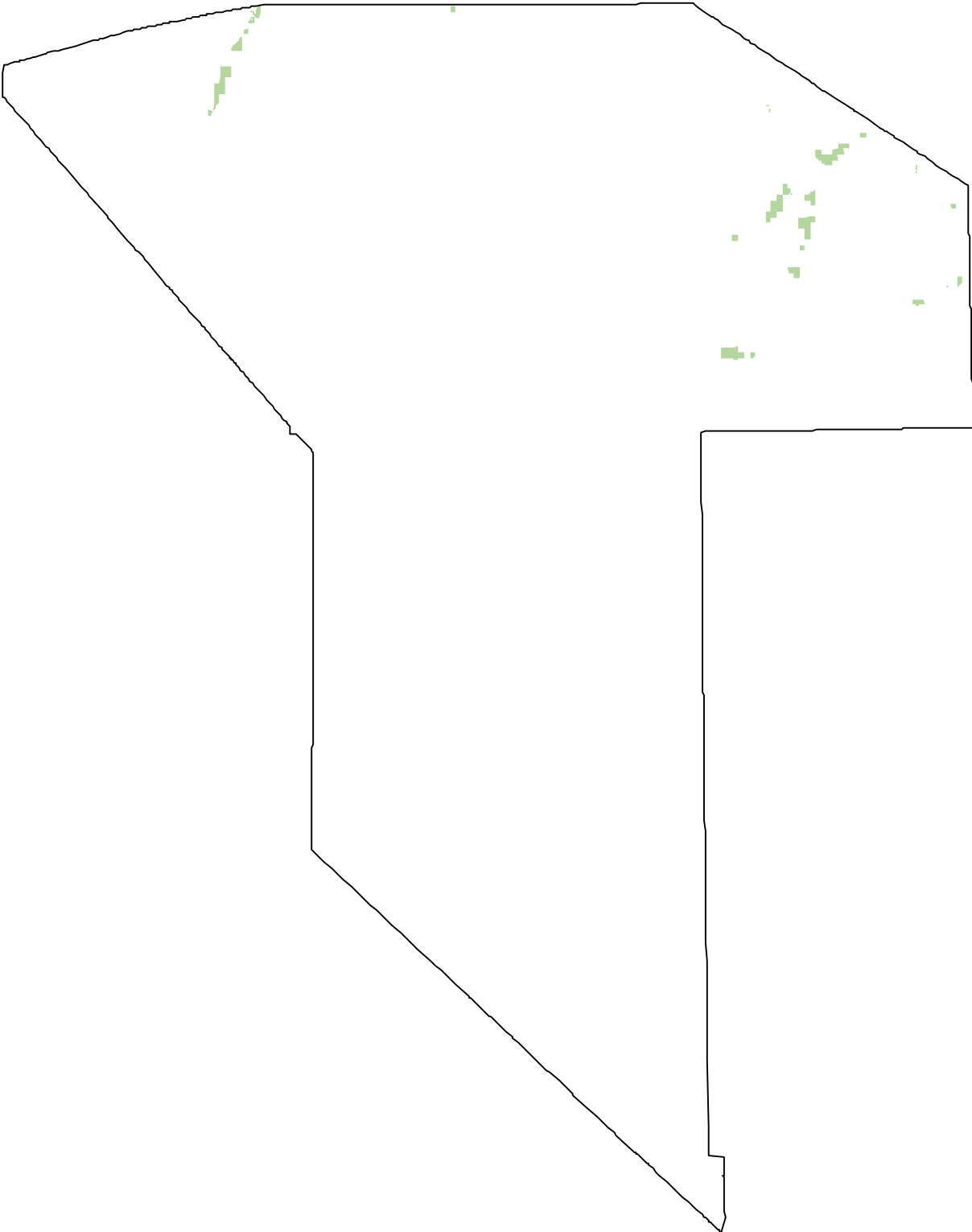
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Legend

PLR Area Seeking Relief

County Boundary

N

Scale = 1:1,750,000

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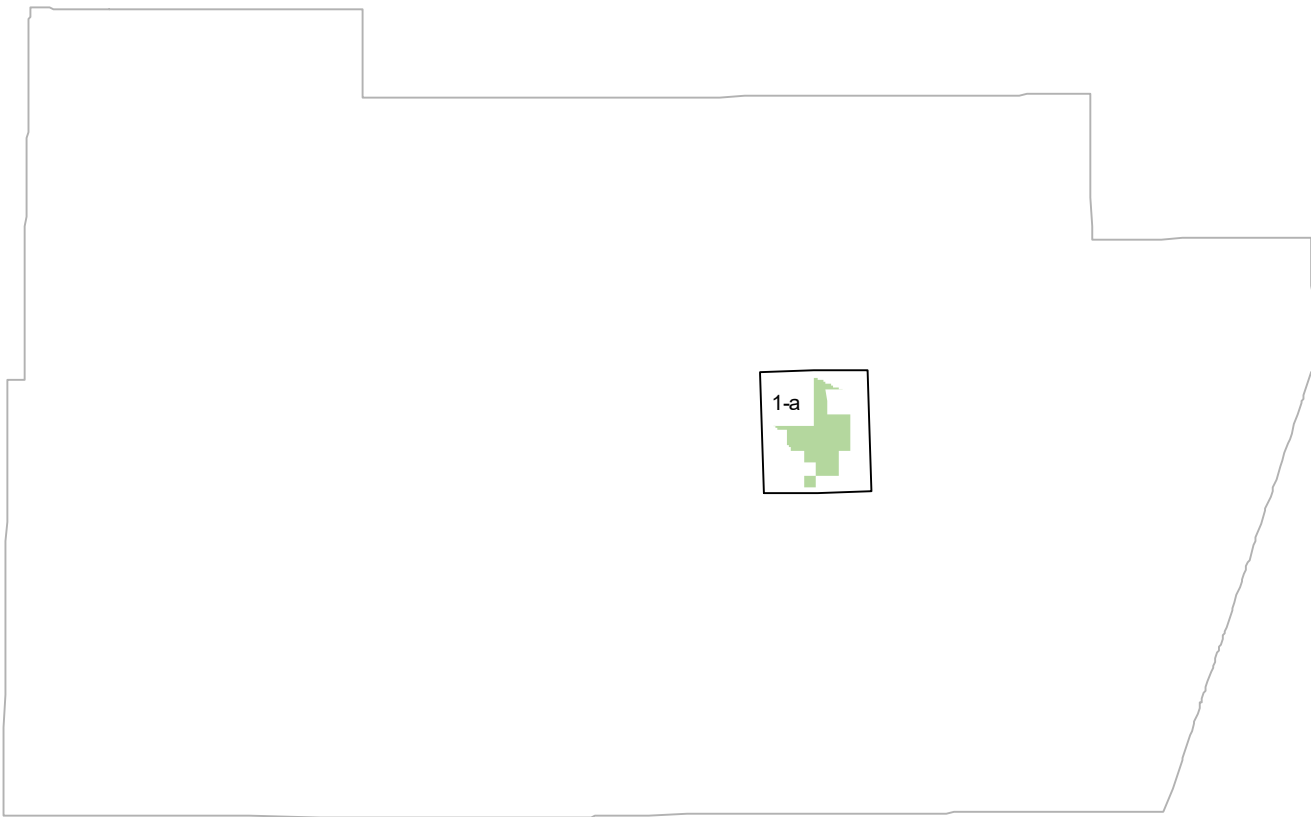
Miles

Map prepared August, 2025

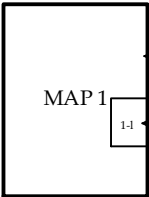
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Legend



DETAIL MAPS
← 1:288,000 Scale Map
-Ex: "MAP 1"
← 1:72,000 Scale Map
-Ex: "1-a"



PLR Area Seeking Relief



County Boundary



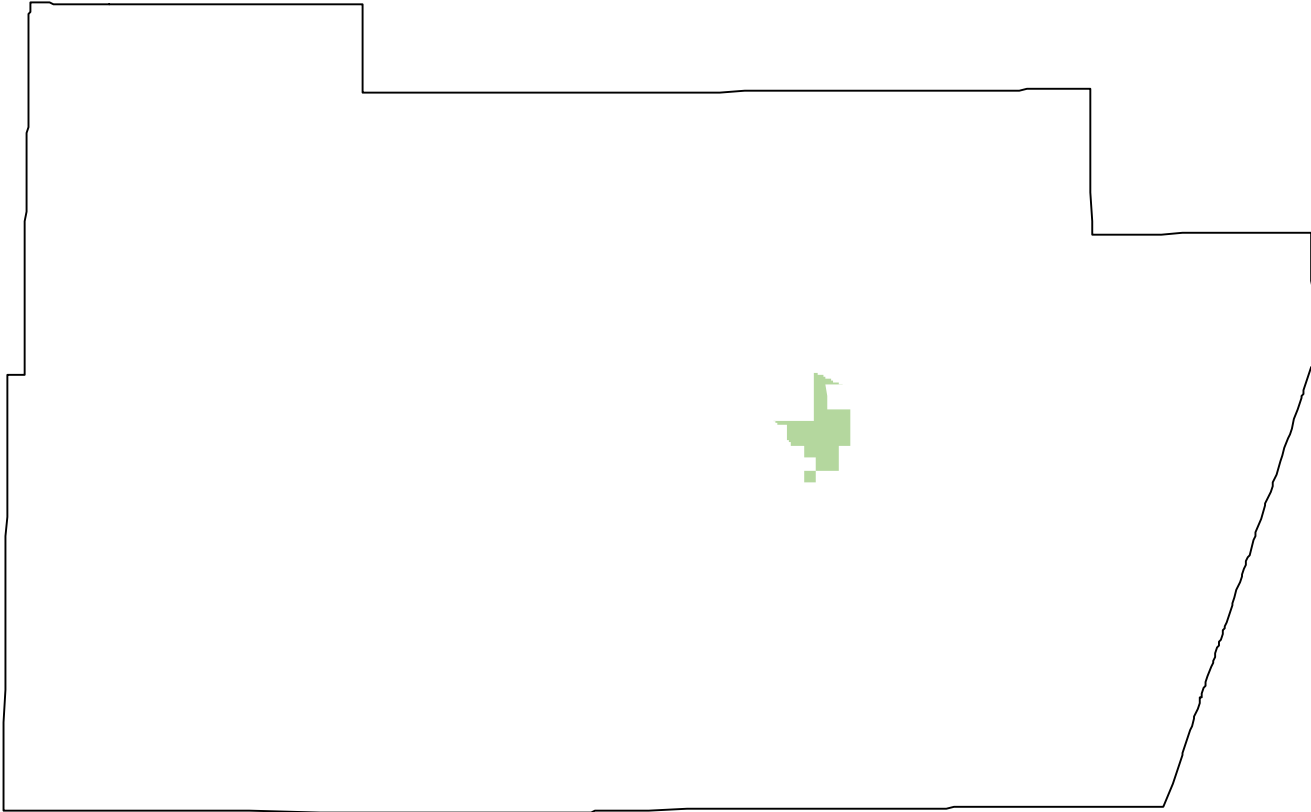
Scale = 1:1,000,000



Map prepared August, 2025



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Legend



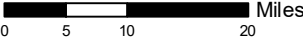
PLR Area Seeking Relief



County Boundary



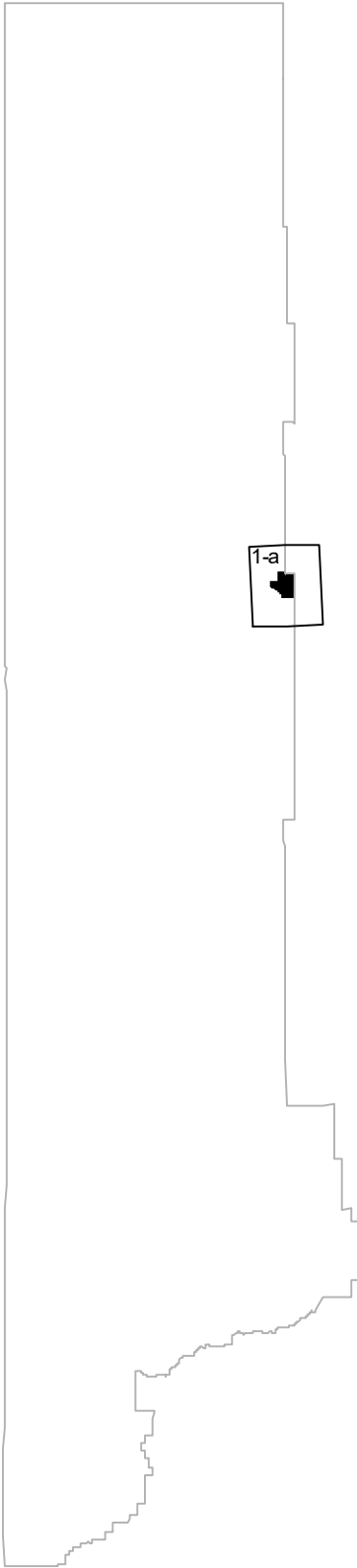
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Map prepared August, 2025



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Legend

MAP 1

1-a

DETAIL MAPS

1:288,000 Scale Map
-Ex: "MAP 1"

1:72,000 Scale Map
-Ex: "1-a"

PLR Area Seeking Relief

County Boundary

N

Scale = 1:1,500,000

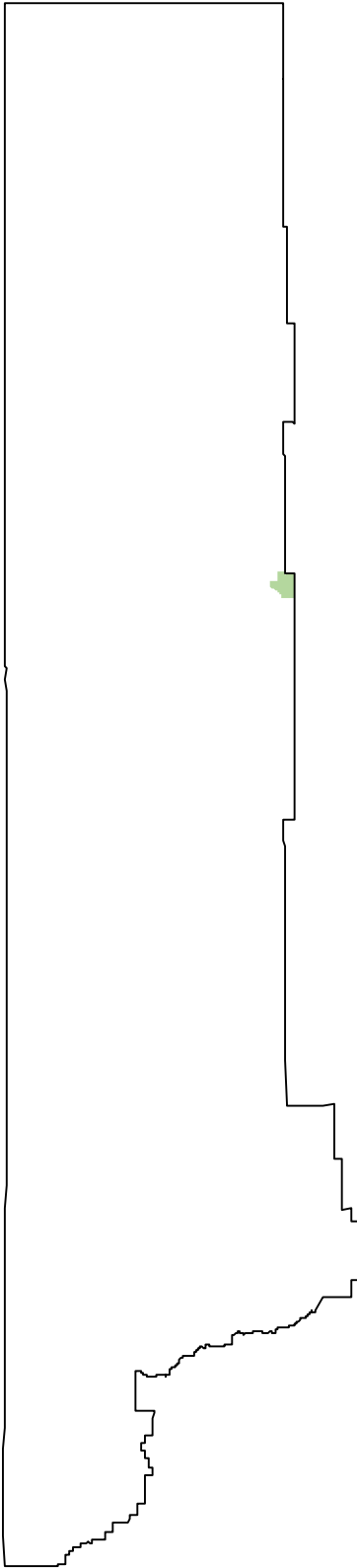
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Map prepared August, 2025

AT&T

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Legend

PLR Area Seeking Relief

County Boundary

N

Scale = 1:1,500,000

0102040

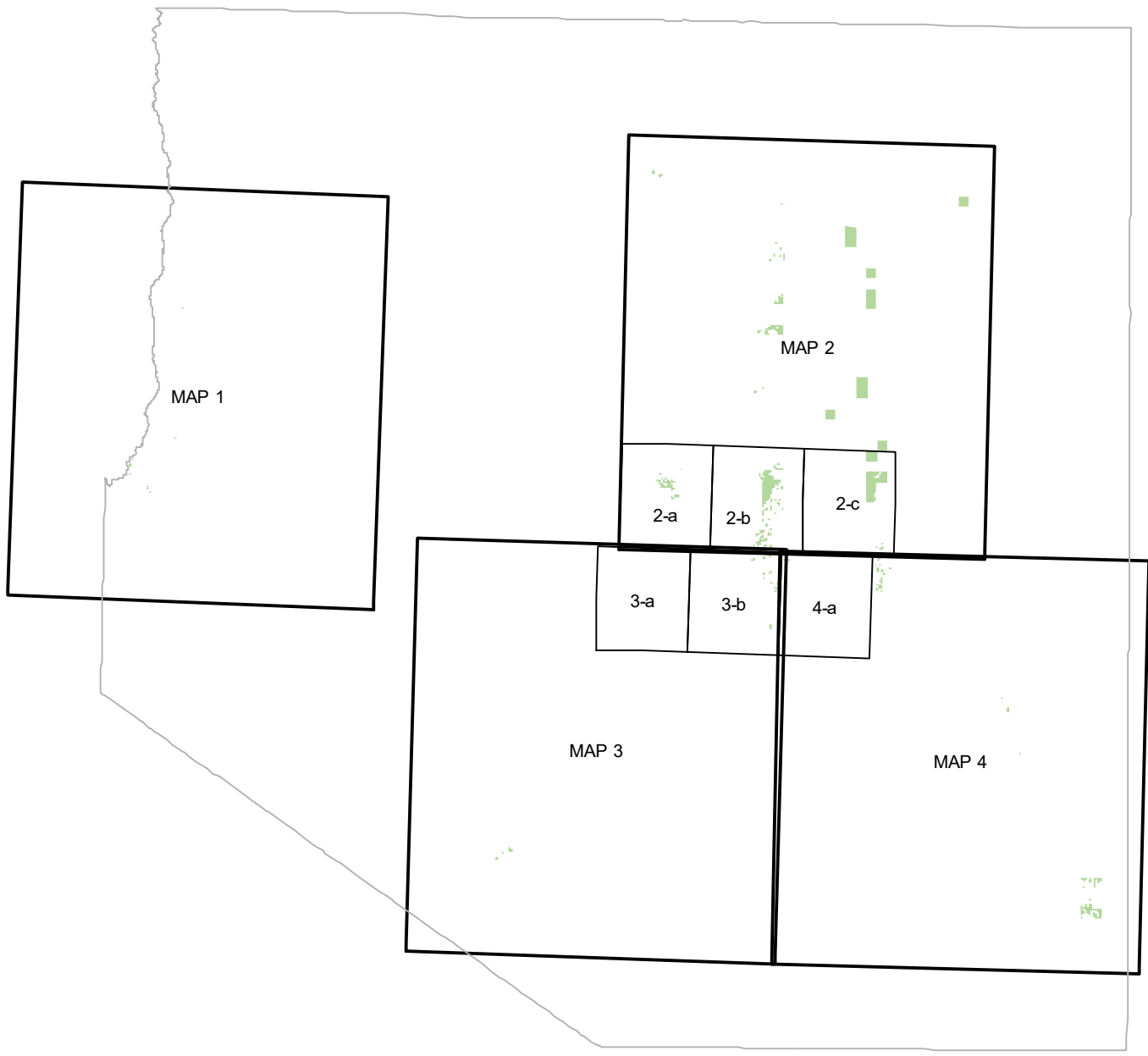
Miles

Map prepared August, 2025

AT&T

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Legend

MAP 1

1-a

DETAIL MAPS

1:288,000 Scale Map

-Ex: "MAP 1"

1:72,000 Scale Map

-Ex: "1-a"

PLR Area Seeking Relief

County Boundary

N

Scale = 1:1,000,000

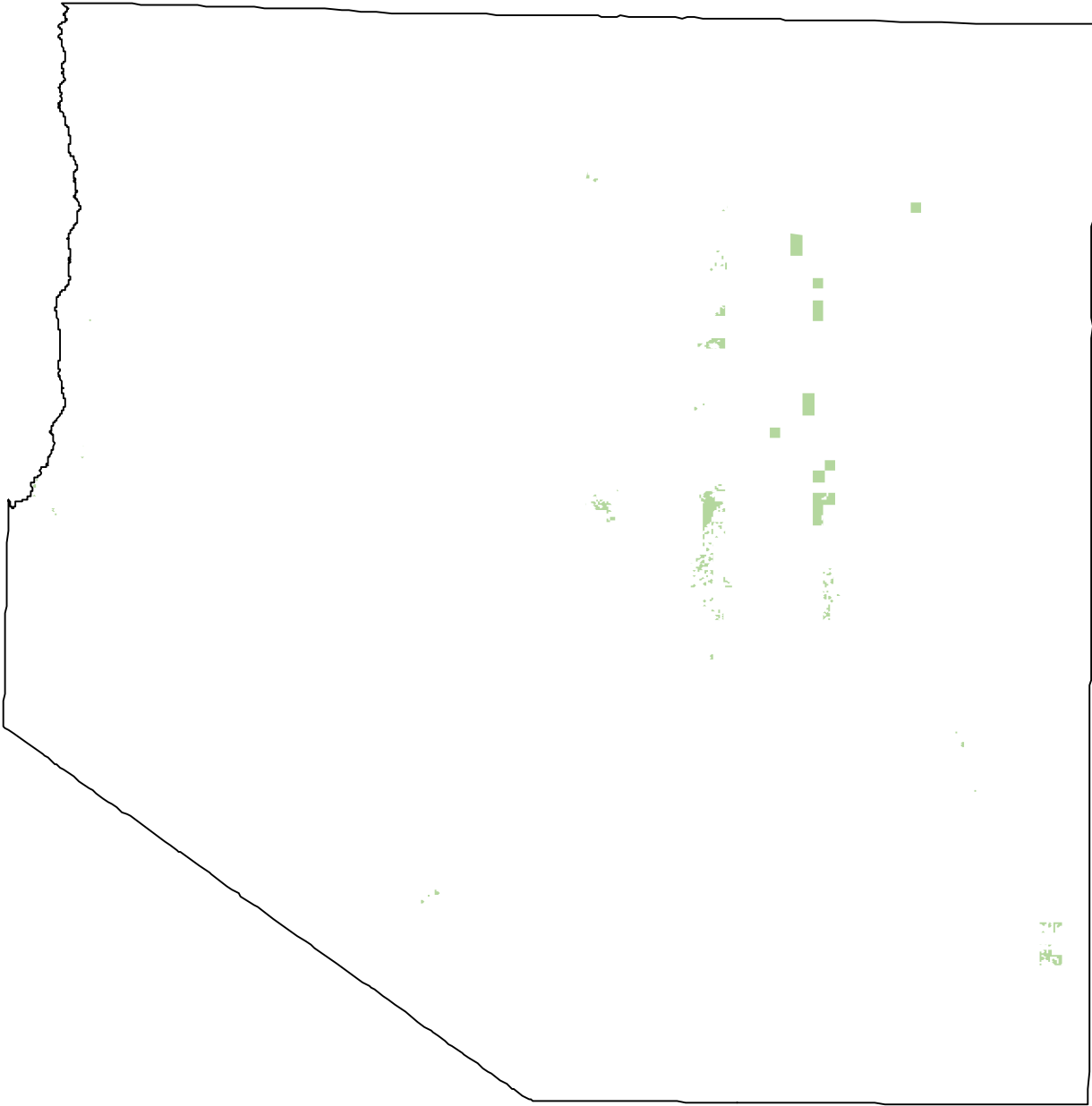
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Map prepared August, 2025

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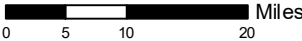
PLR Area Seeking Relief



County Boundary



Scale = 1:1,000,000



Map prepared August, 2025

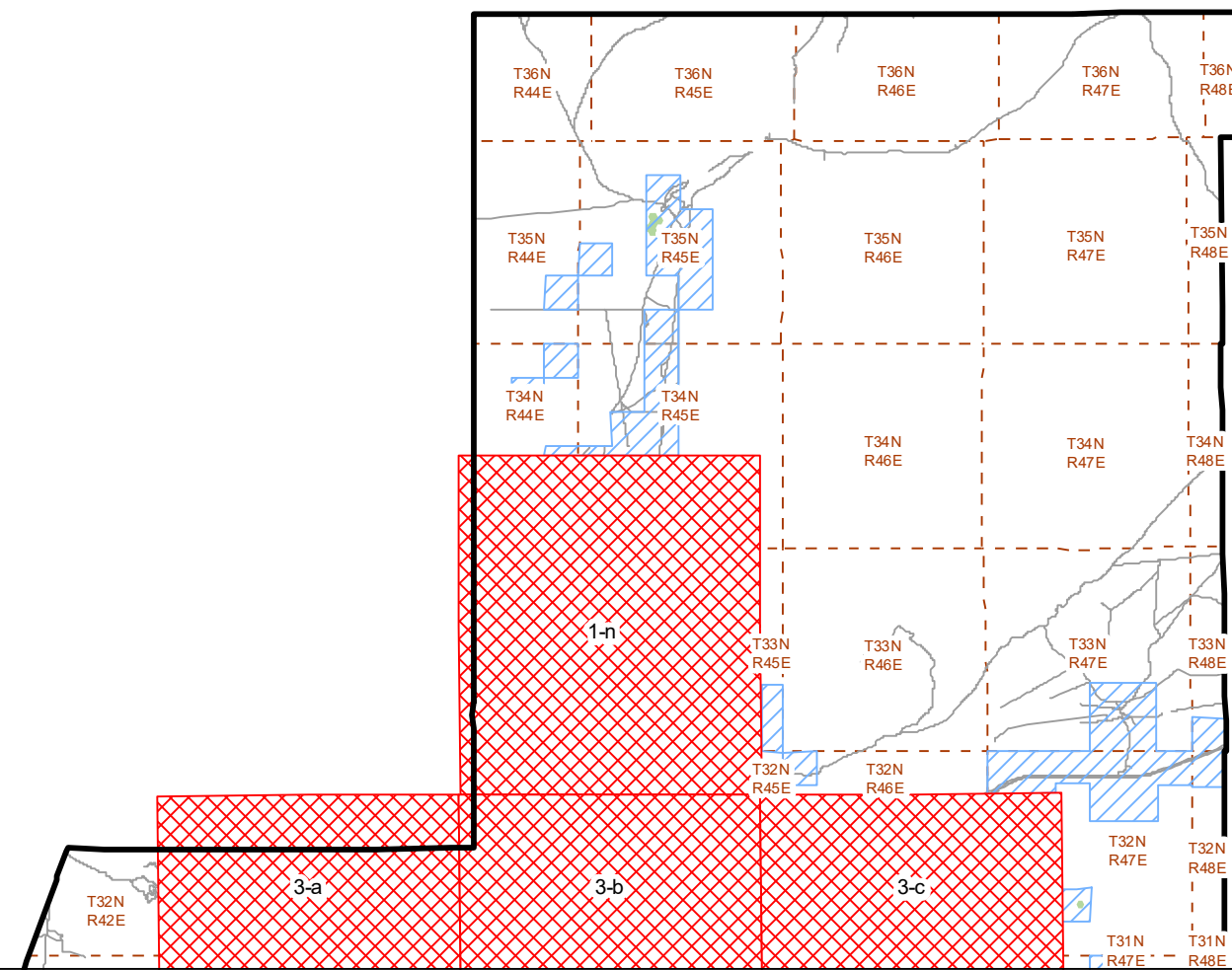


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Exhibit 3

Street level maps of POLR Areas

Scale of 1:288,000



Legend

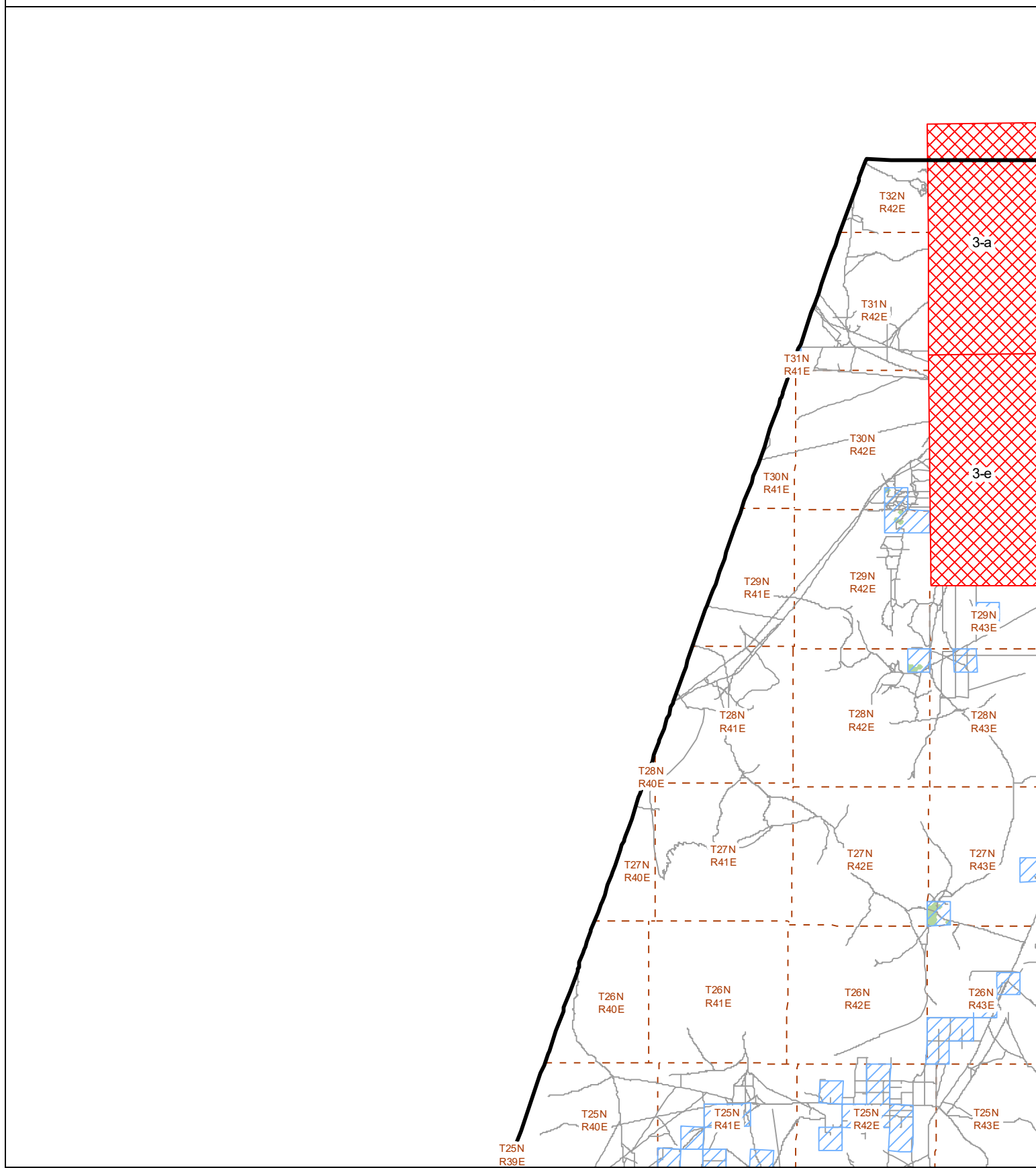
- PLR Area Seeking Relief
- AT&T Exchange Boundary
- County Boundary

- PLSS Township Boundaries
- Detail Map Area "288K Map#-72K Map#"
- Streets




Scale = 1:288,000
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 Map prepared August, 2025






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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area "288K Map#-72K Map#"
-  Streets



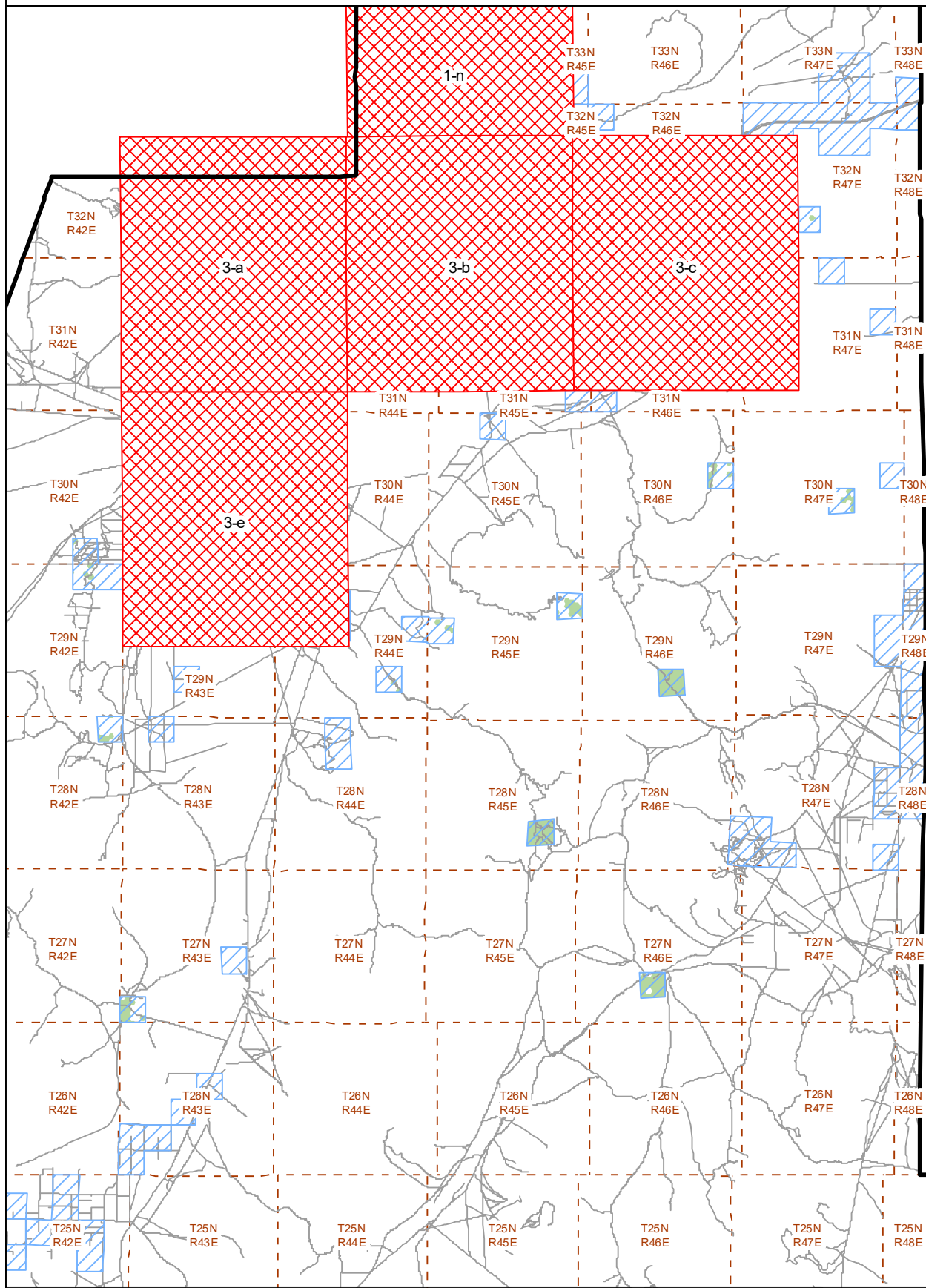
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Map prepared August, 2025






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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area
"288K Map#-72K Map#"
-  Streets

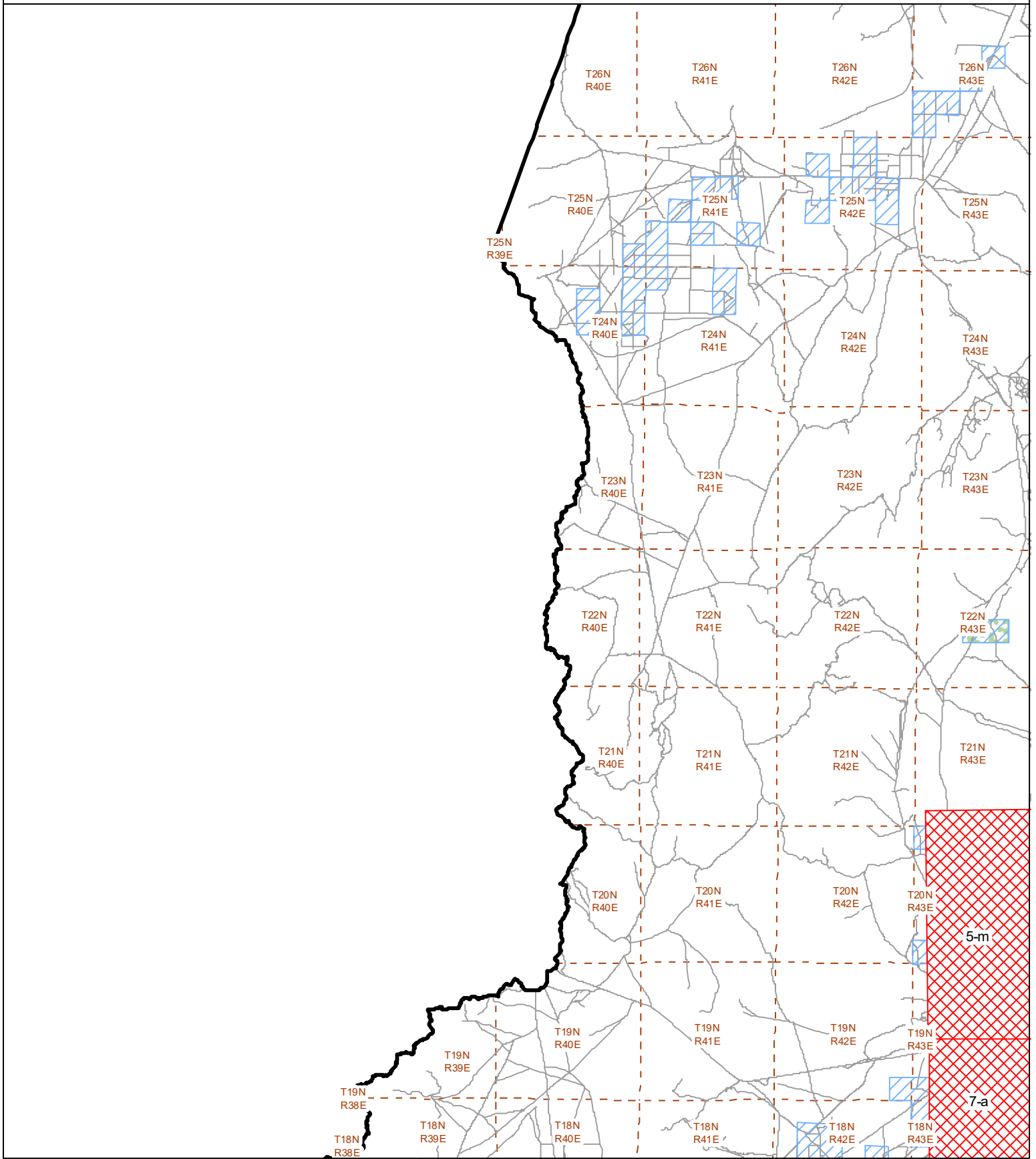


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0 8,000 16,000 32,000 Feet
Map prepared August, 2025






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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area
"288K Map#-72K Map#"
-  Streets

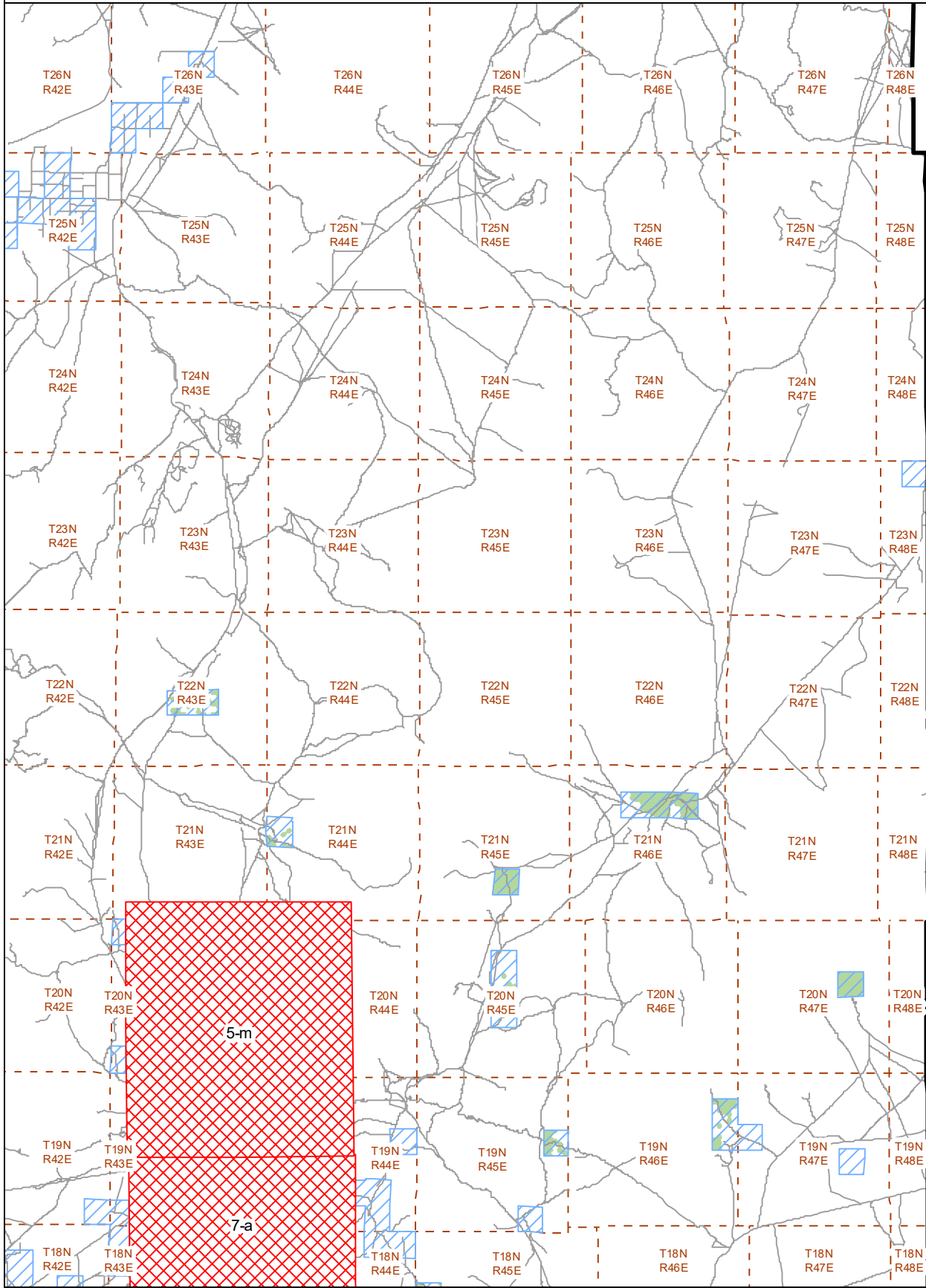


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


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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area "288K Map#-72K Map#" 5-m
-  Streets

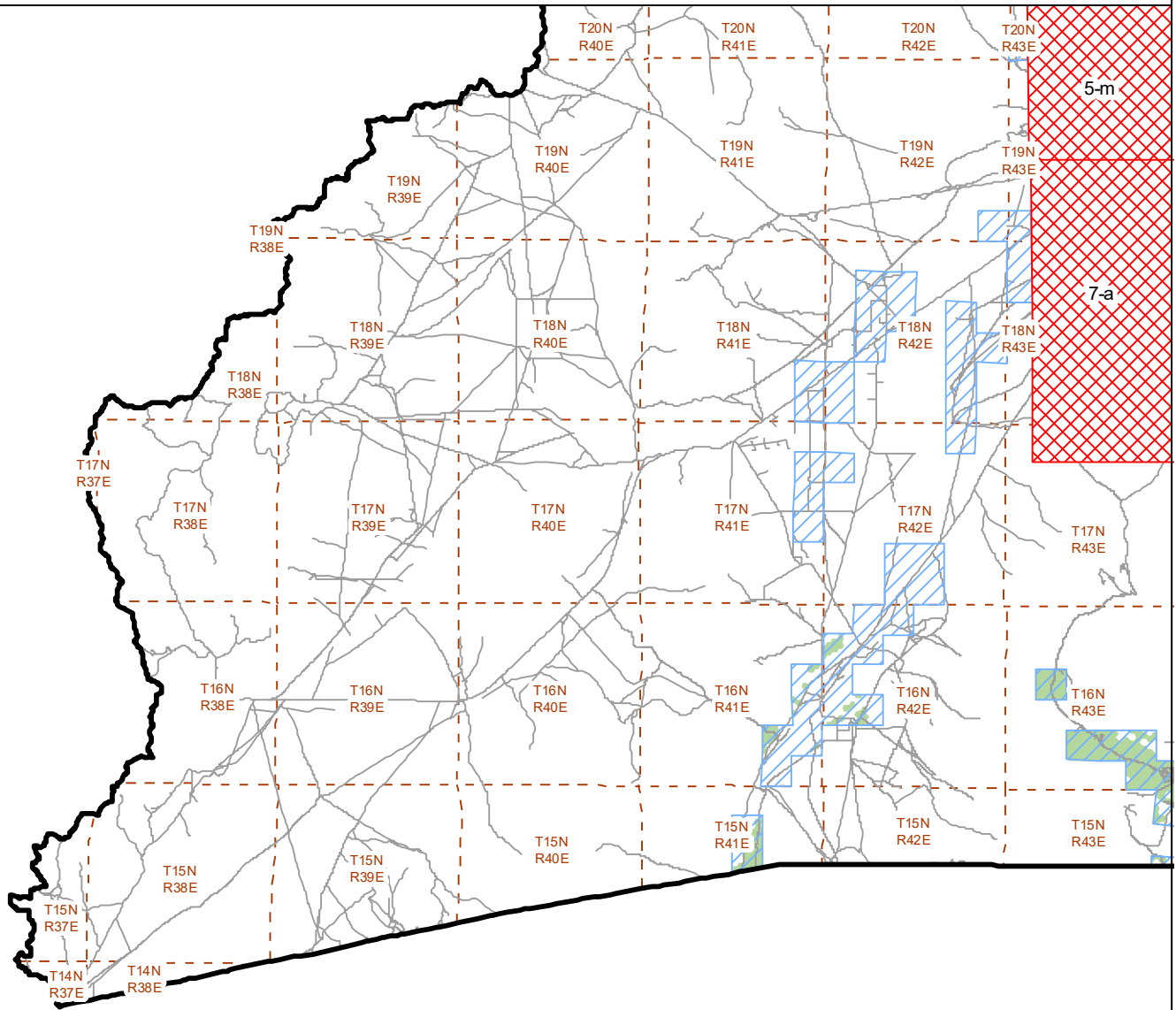


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Map prepared August, 2025






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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area "288K Map#-72K Map#"
-  Streets

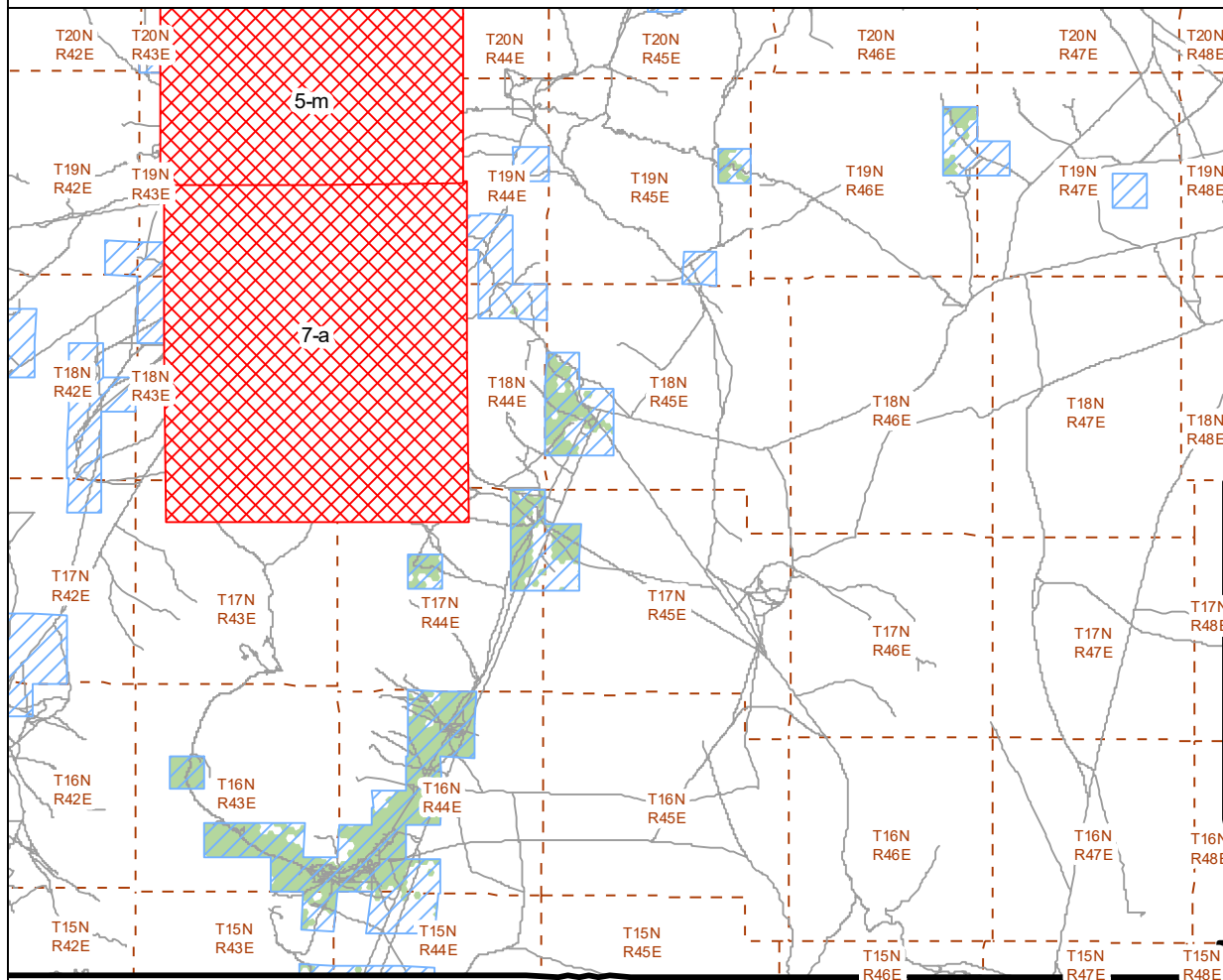


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Map prepared August, 2025






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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area
"288K Map#-72K Map#"
-  Streets



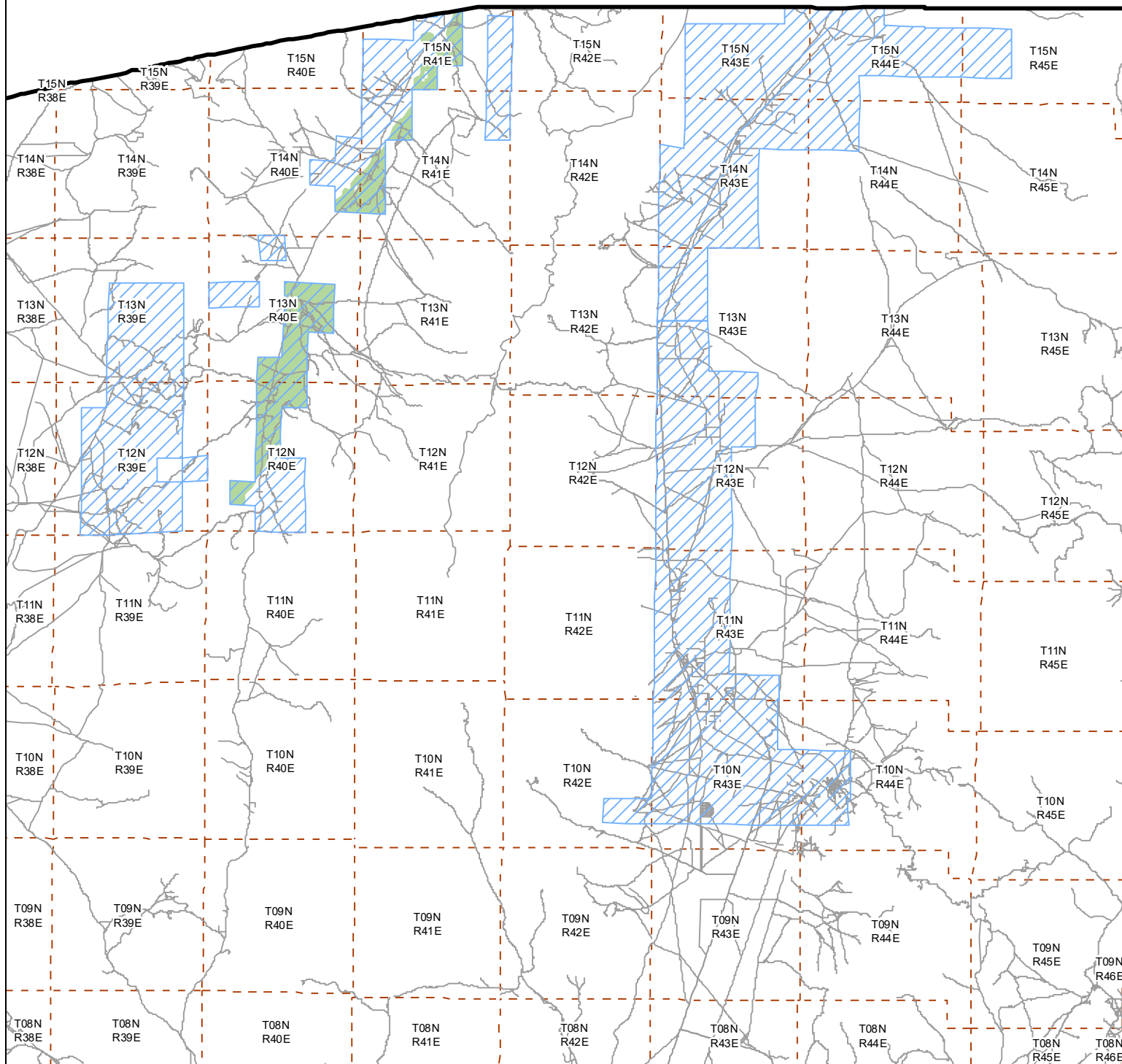
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Map prepared August, 2025



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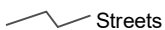


Legend

- PLR Area Seeking Relief
- AT&T Exchange Boundary
- County Boundary



PLSS Township Boundaries



Streets

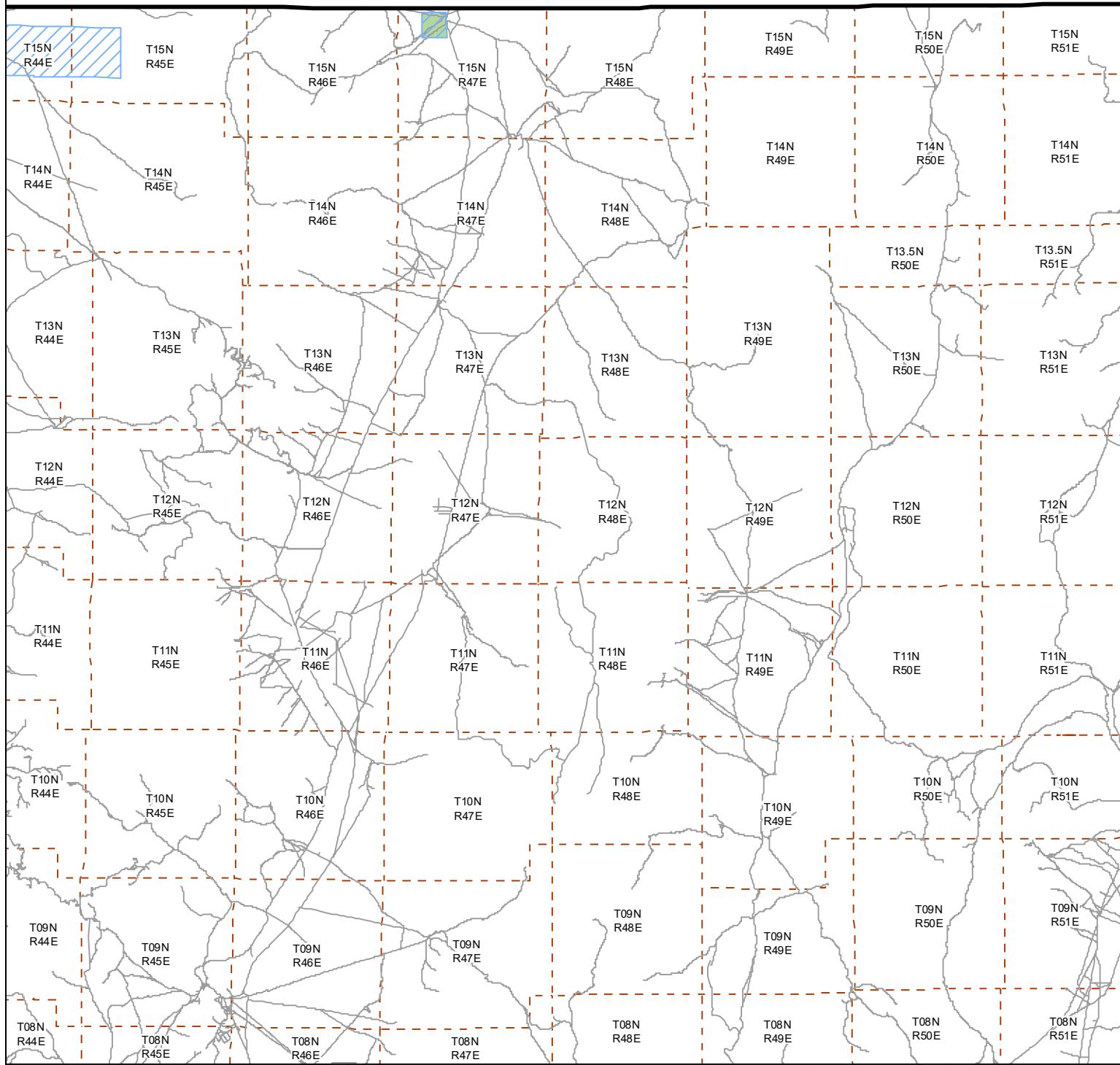


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Map prepared August, 2025



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Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



Scale = 1:1,288,000

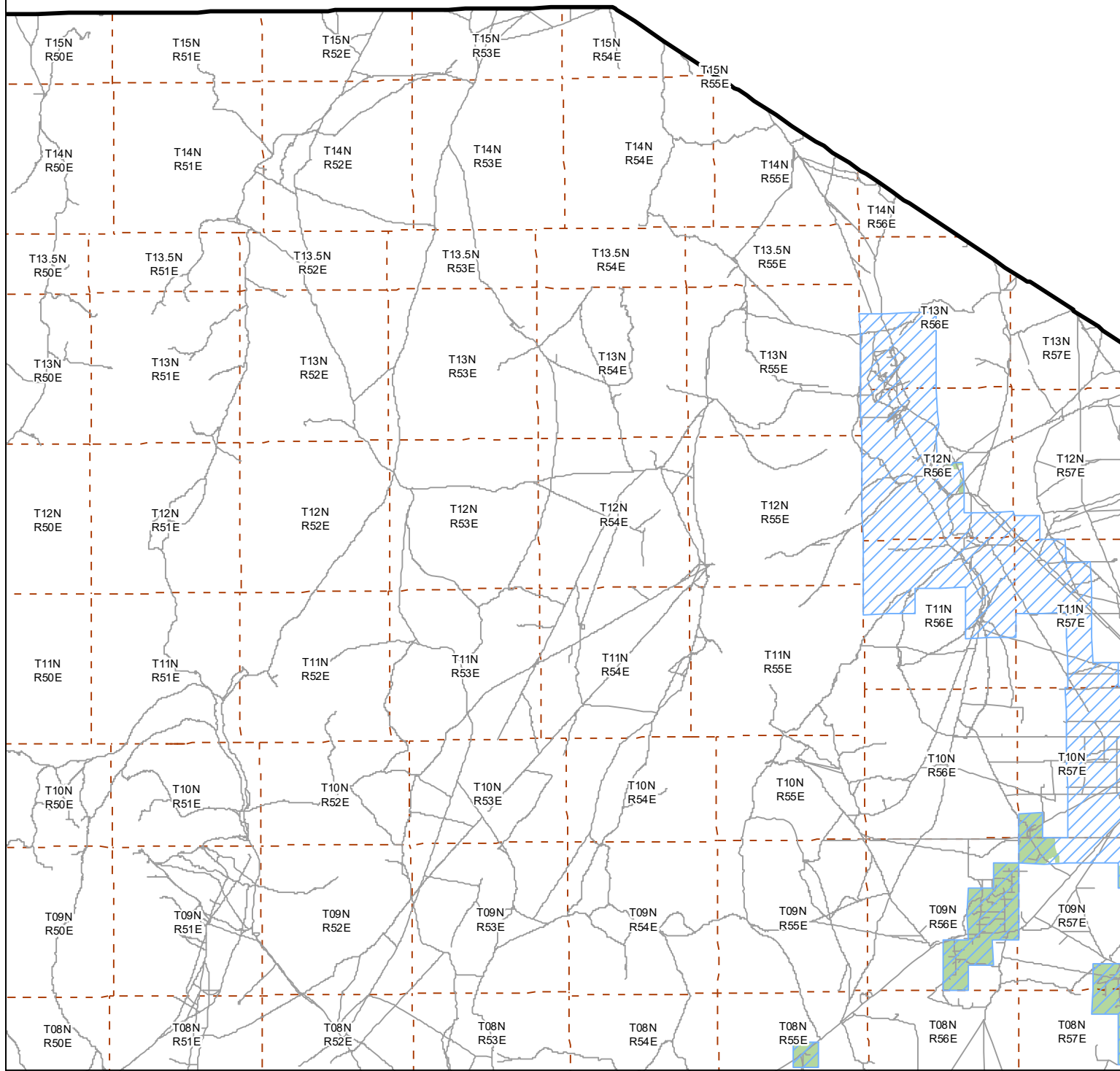
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Map prepared August, 2025



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Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



Scale = 1:1,288,000

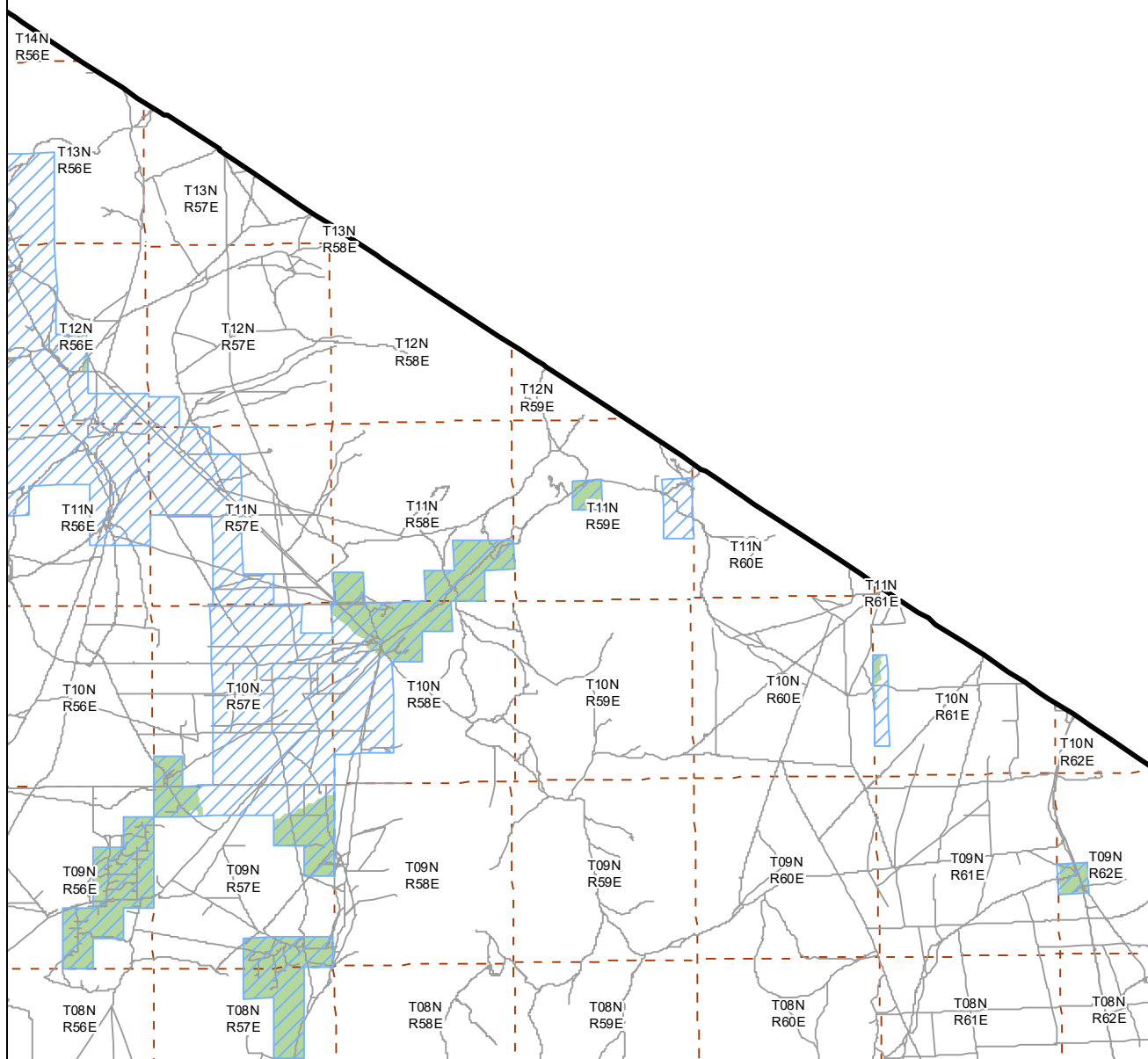
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Map prepared August, 2025



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Legend

- PLR Area Seeking Relief
- AT&T Exchange Boundary
- County Boundary

T21N
R25E

PLSS Township Boundaries

Streets



Scale = 1:1,288,000

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Map prepared August, 2025

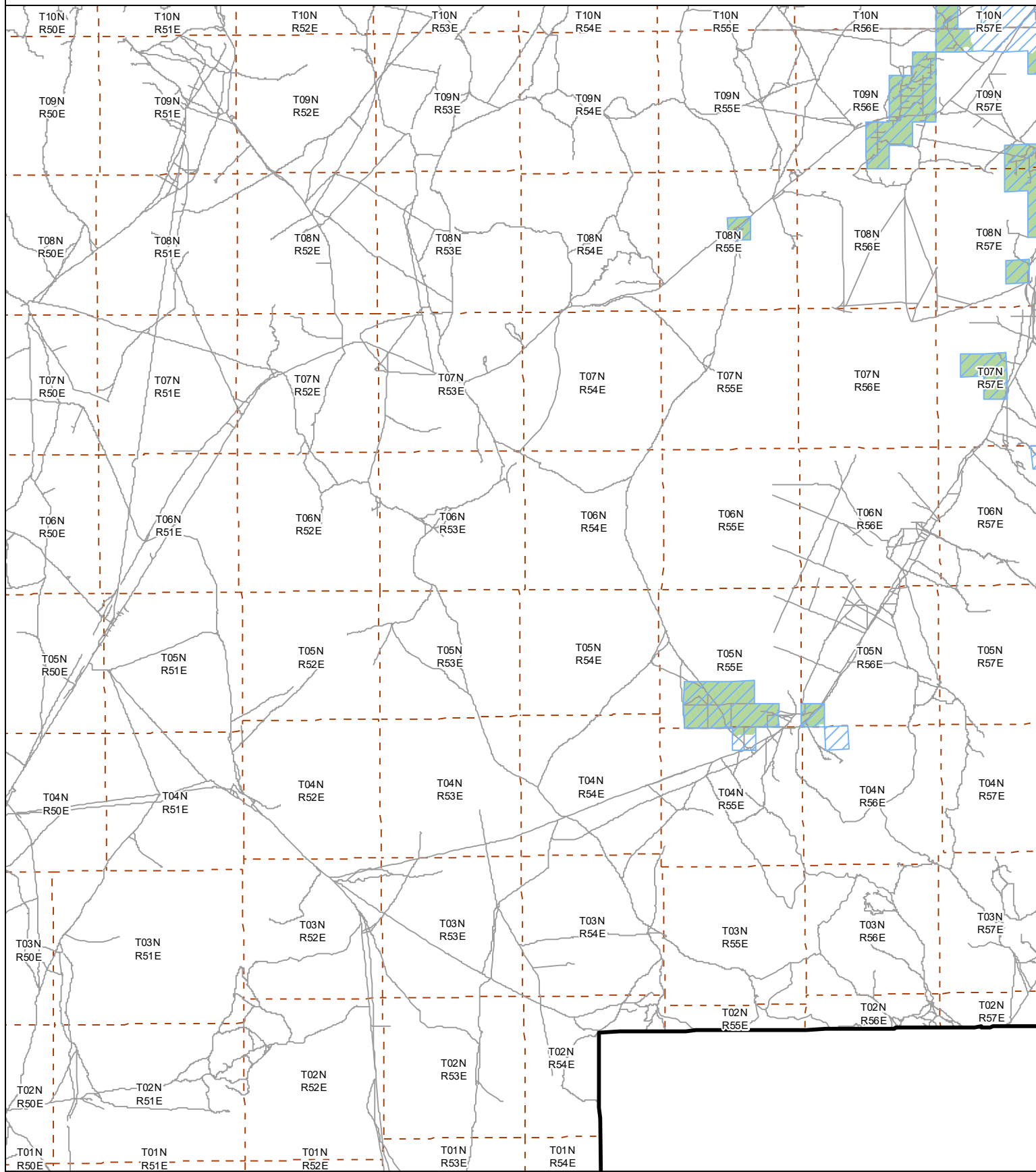


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NYE COUNTY

MAP 5



Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



Scale = 1:1,288,000

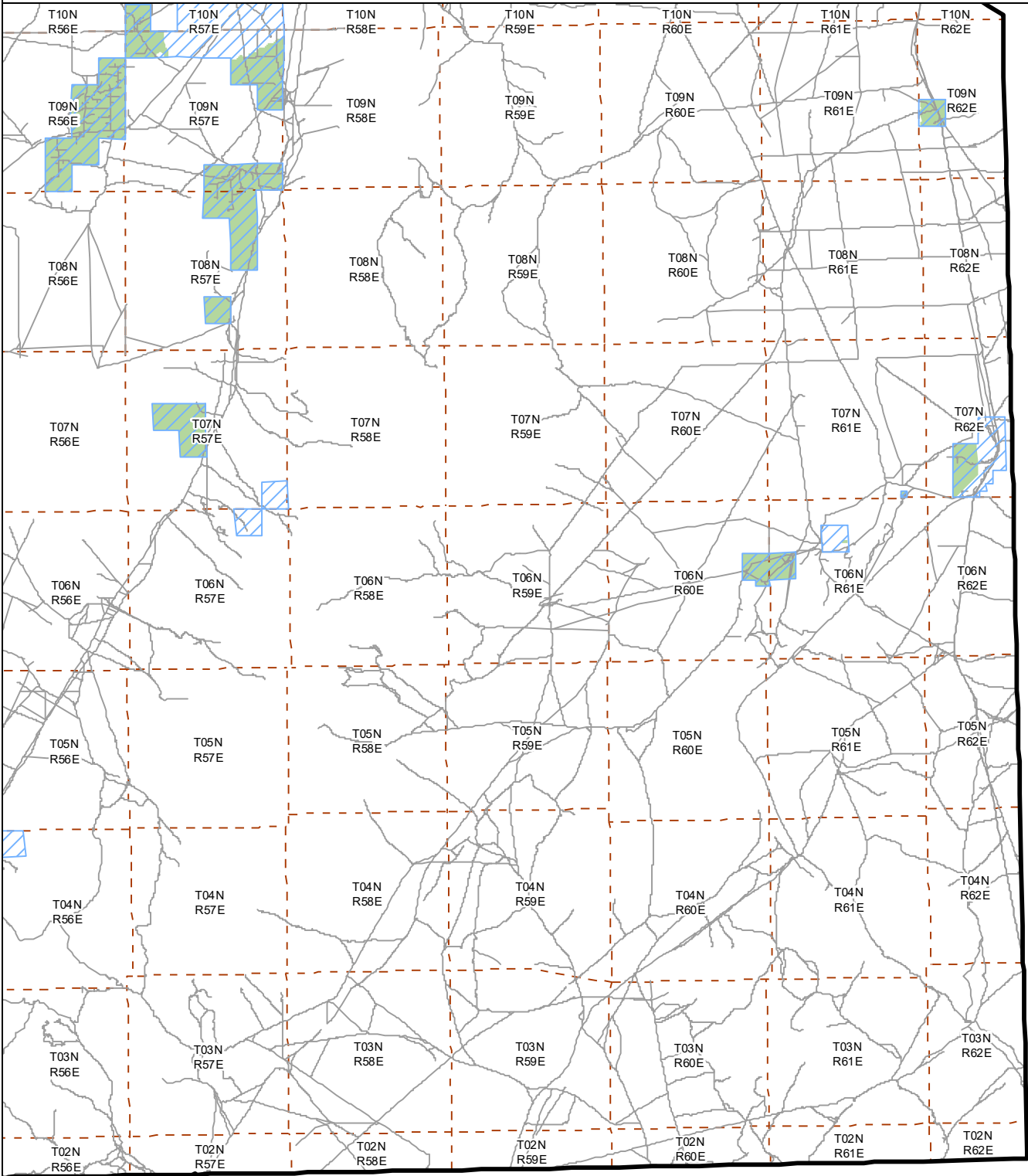
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Map prepared August, 2025






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
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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

 PLSS Township Boundaries

 Streets



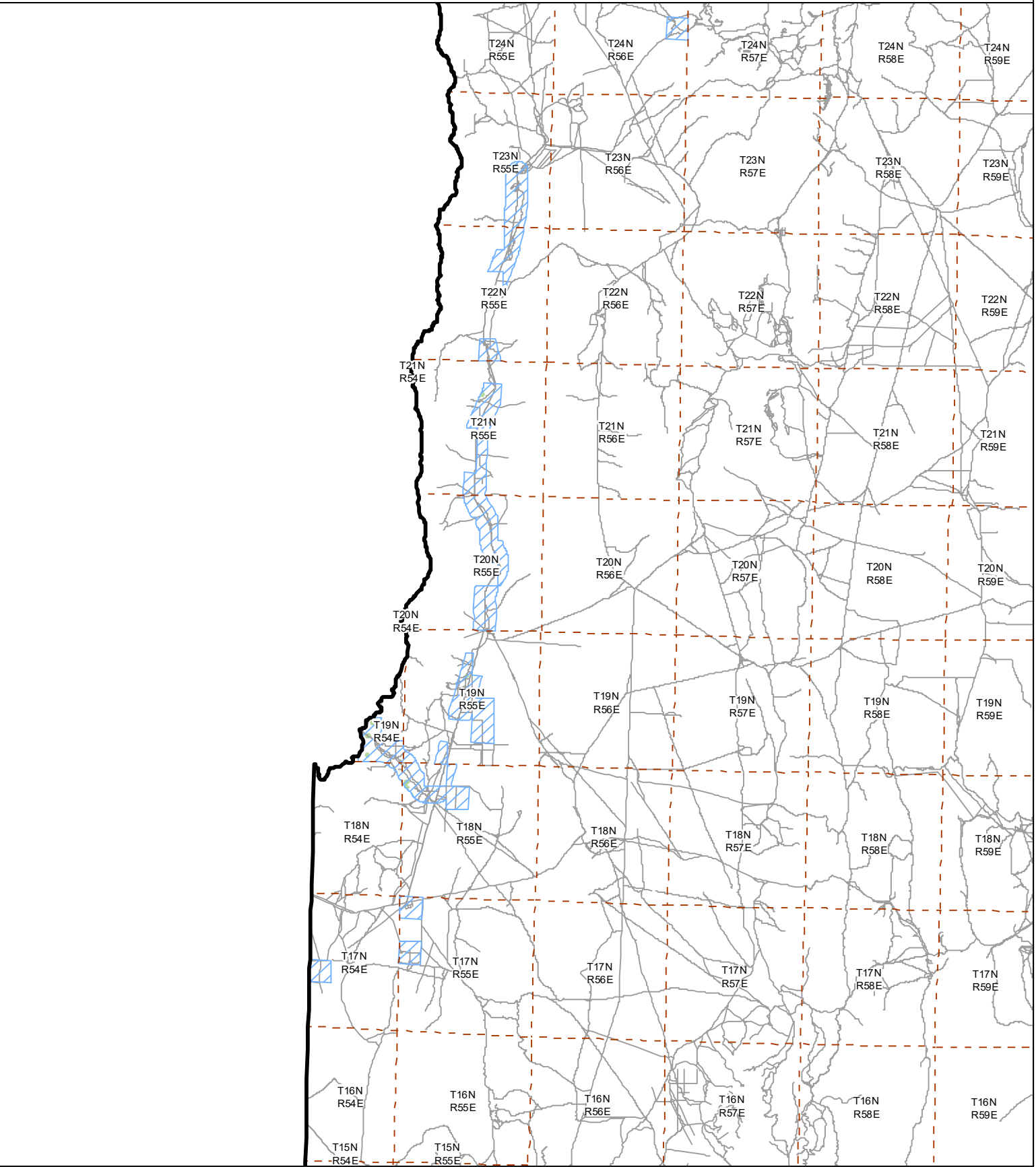
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Map prepared August, 2025



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Legend

- PLR Area Seeking Relief
- AT&T Exchange Boundary
- County Boundary

- PLSS Township Boundaries
- Detail Map Area
"288K Map#-72K Map#"
- Streets

Scale = 1:288,000

Feet

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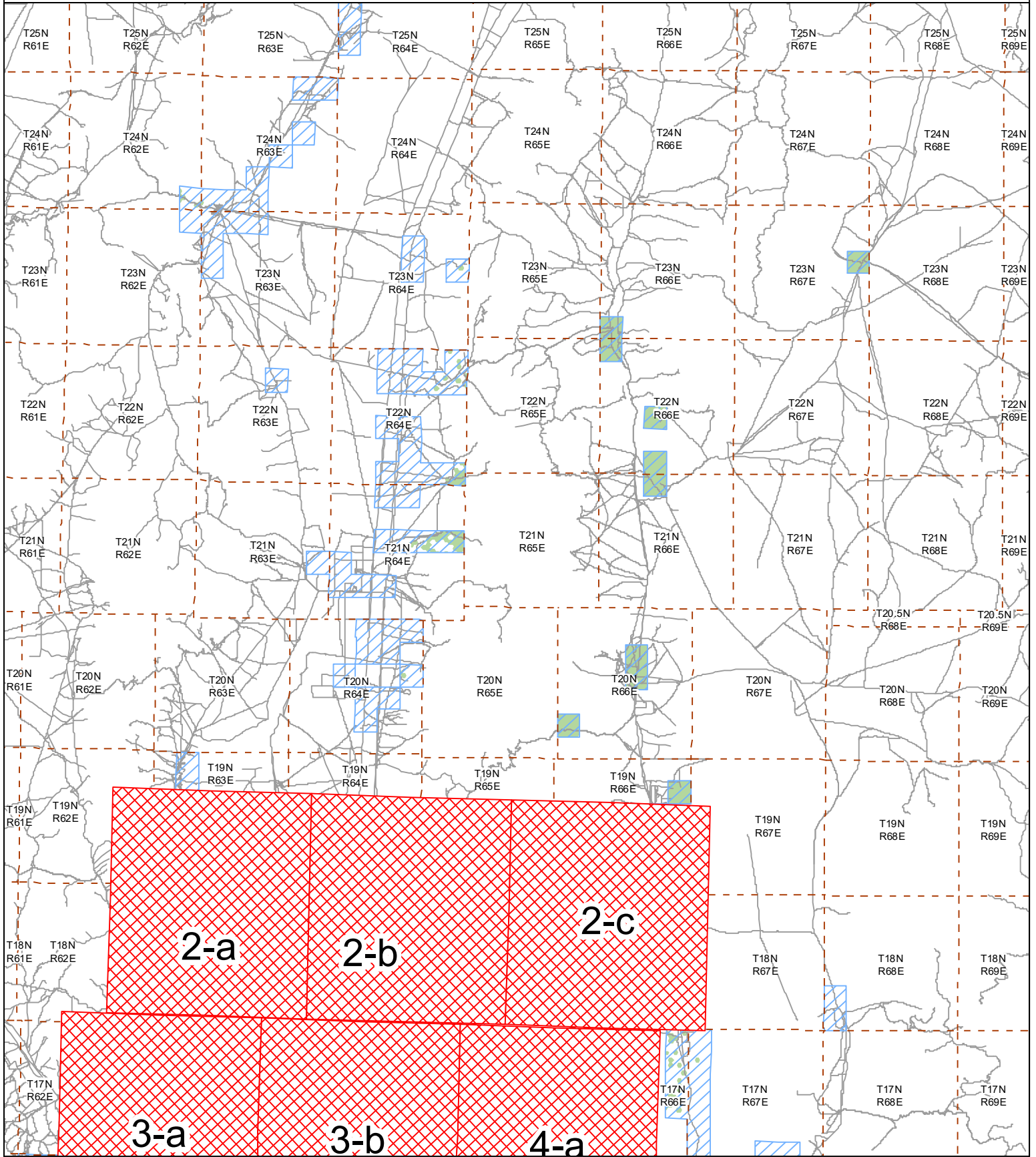
Map prepared August, 2025

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
WHITE PINE COUNTY

MAP 2



Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area
"288K Map#-72K Map#"
-  Streets



Scale = 1:288,000

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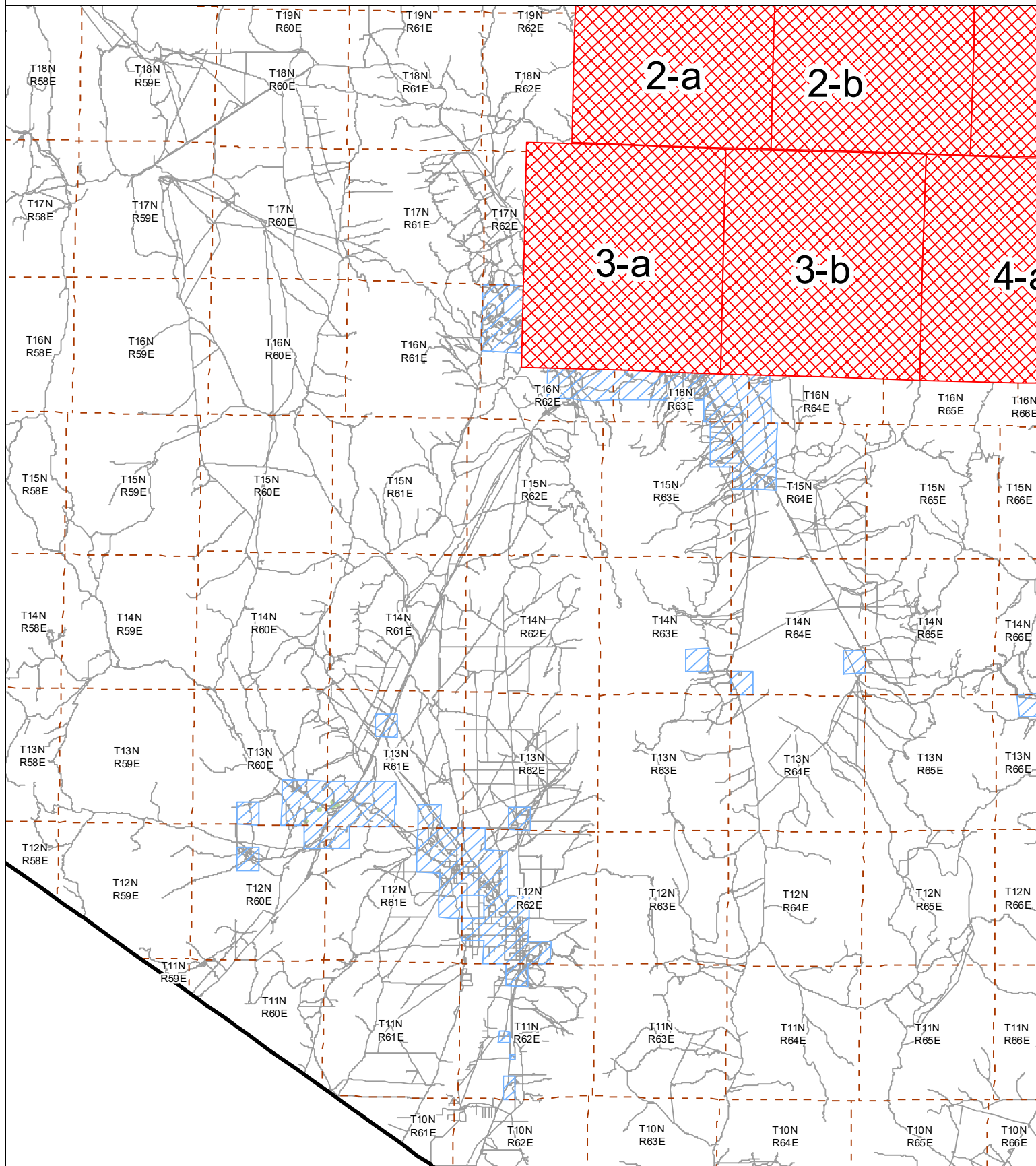
Map prepared August, 2025






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


WHITE PINE COUNTY

MAP 3



Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area
"288K Map#-72K Map#"
-  Streets



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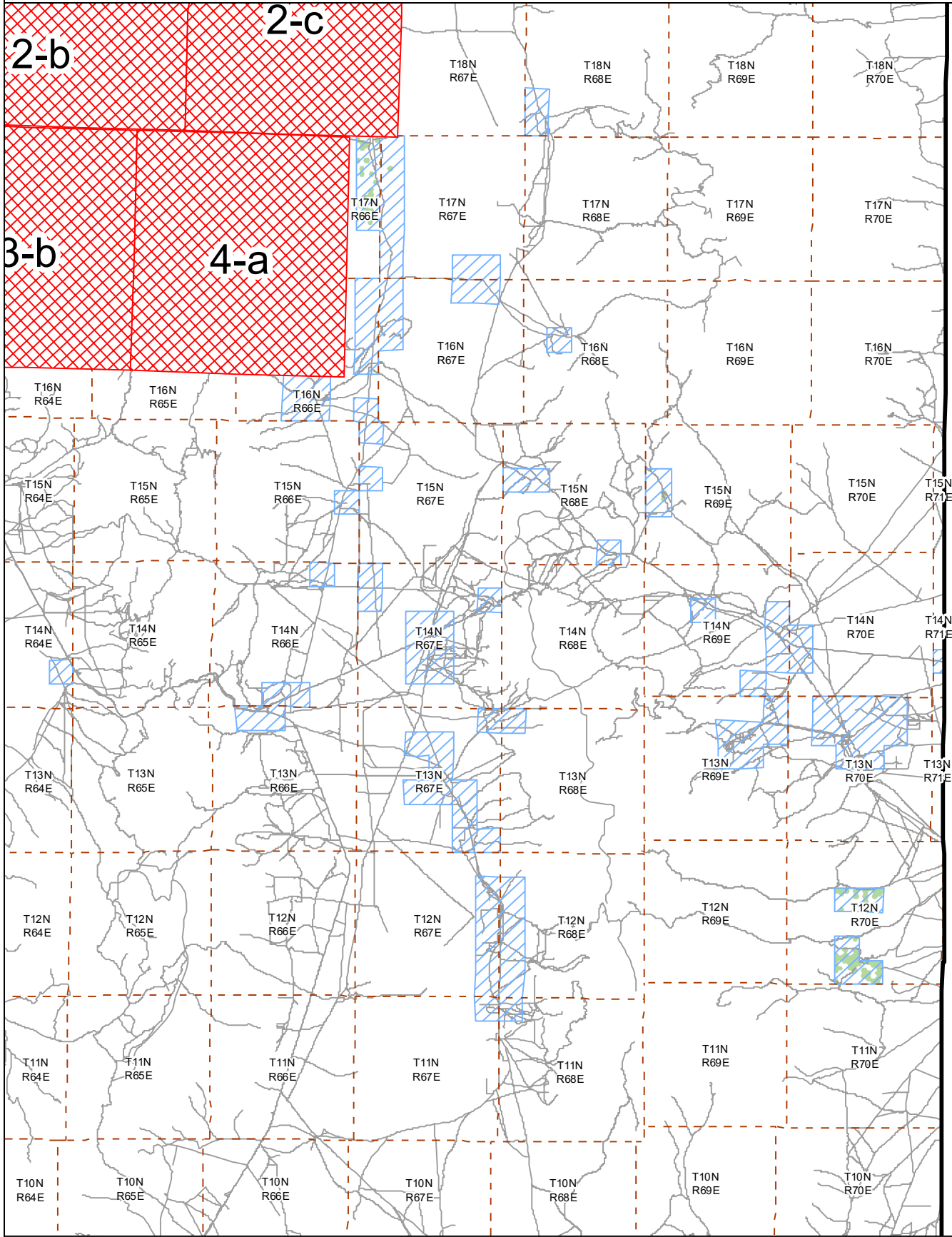
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Map prepared August, 2025









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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Detail Map Area
"288K Map#-72K Map#"
-  Streets



Scale = 1:288,000

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Map prepared August, 2025

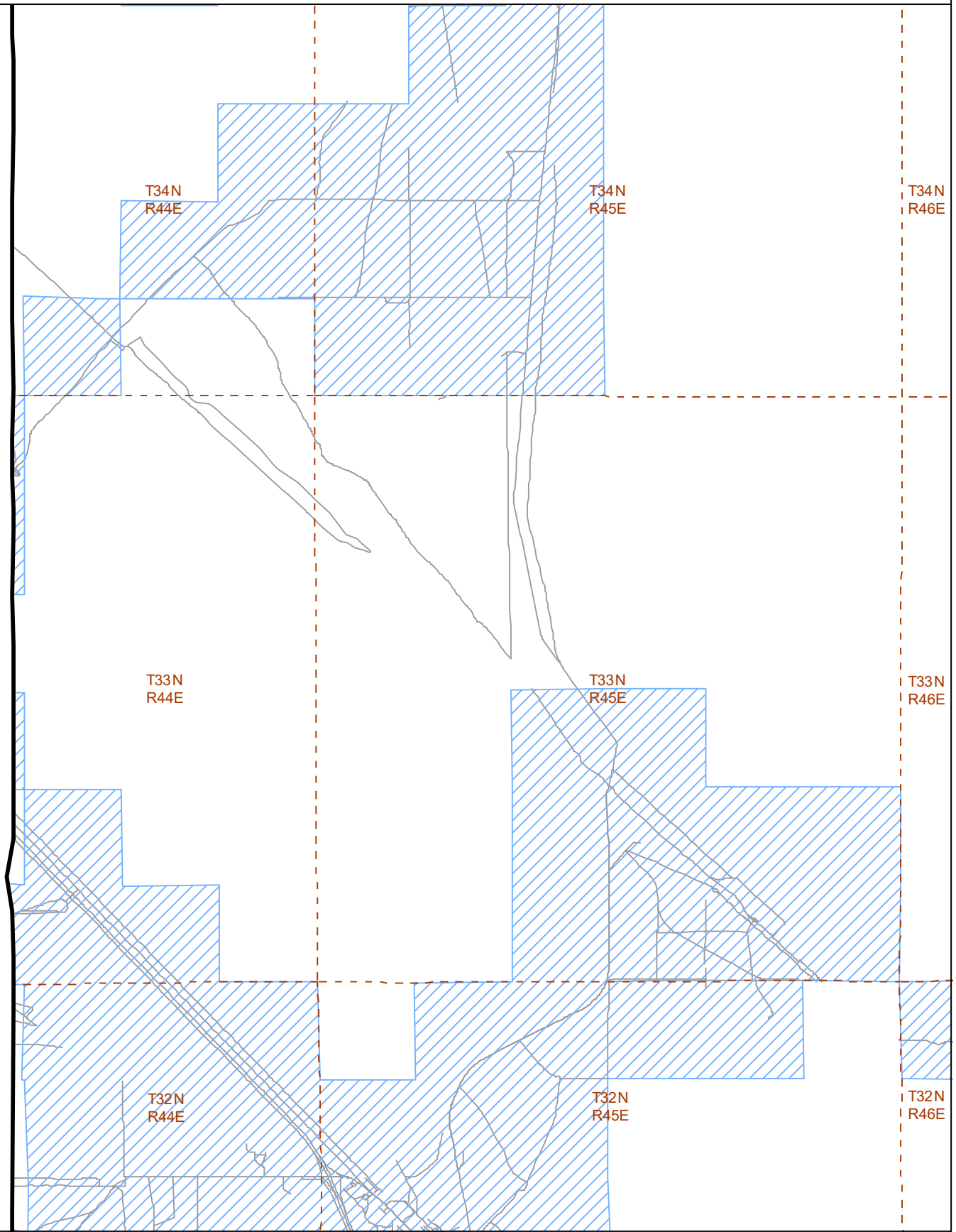


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Exhibit 4

Street level maps of POLR Areas

Scale of 1:72,000



Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



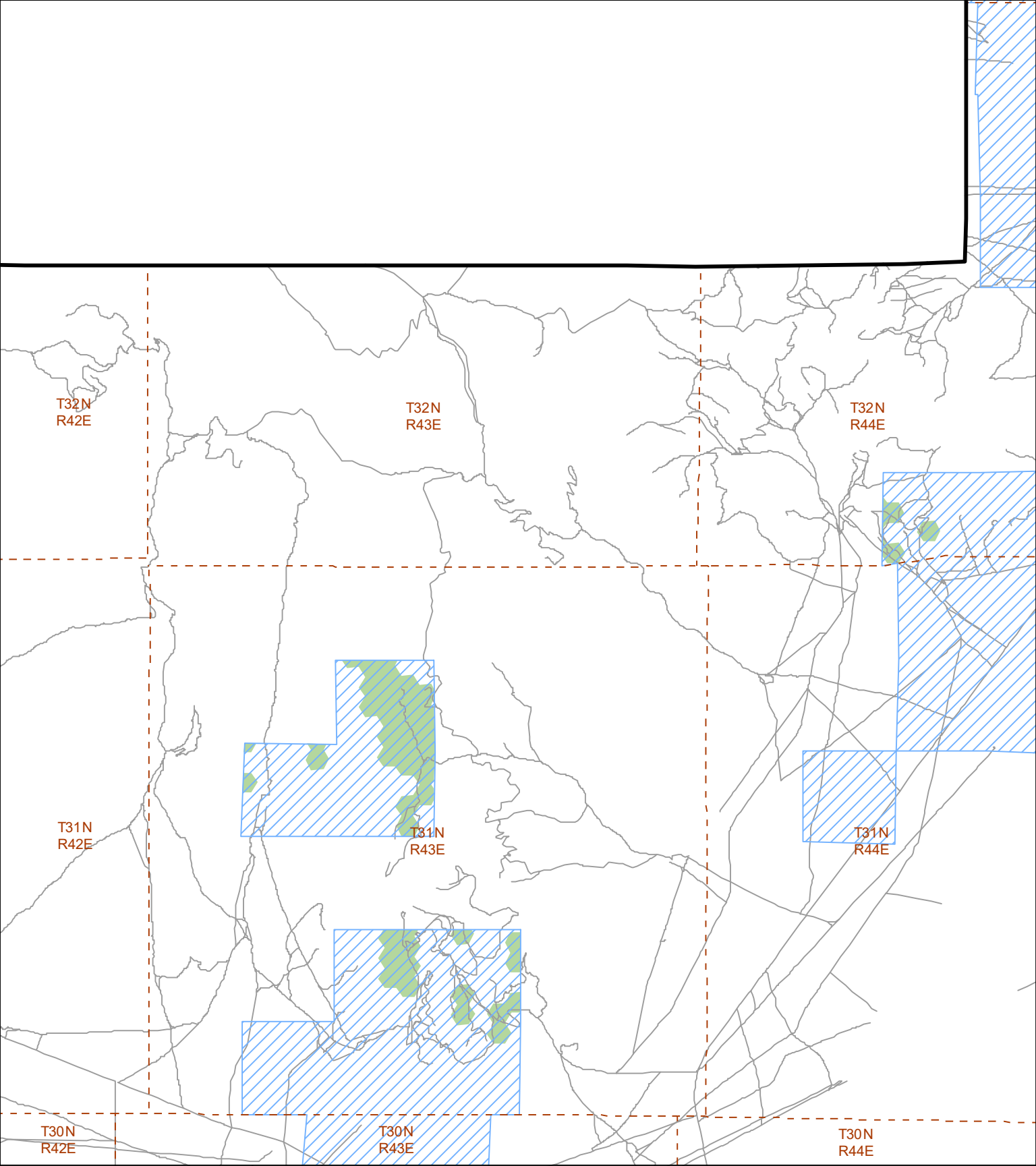
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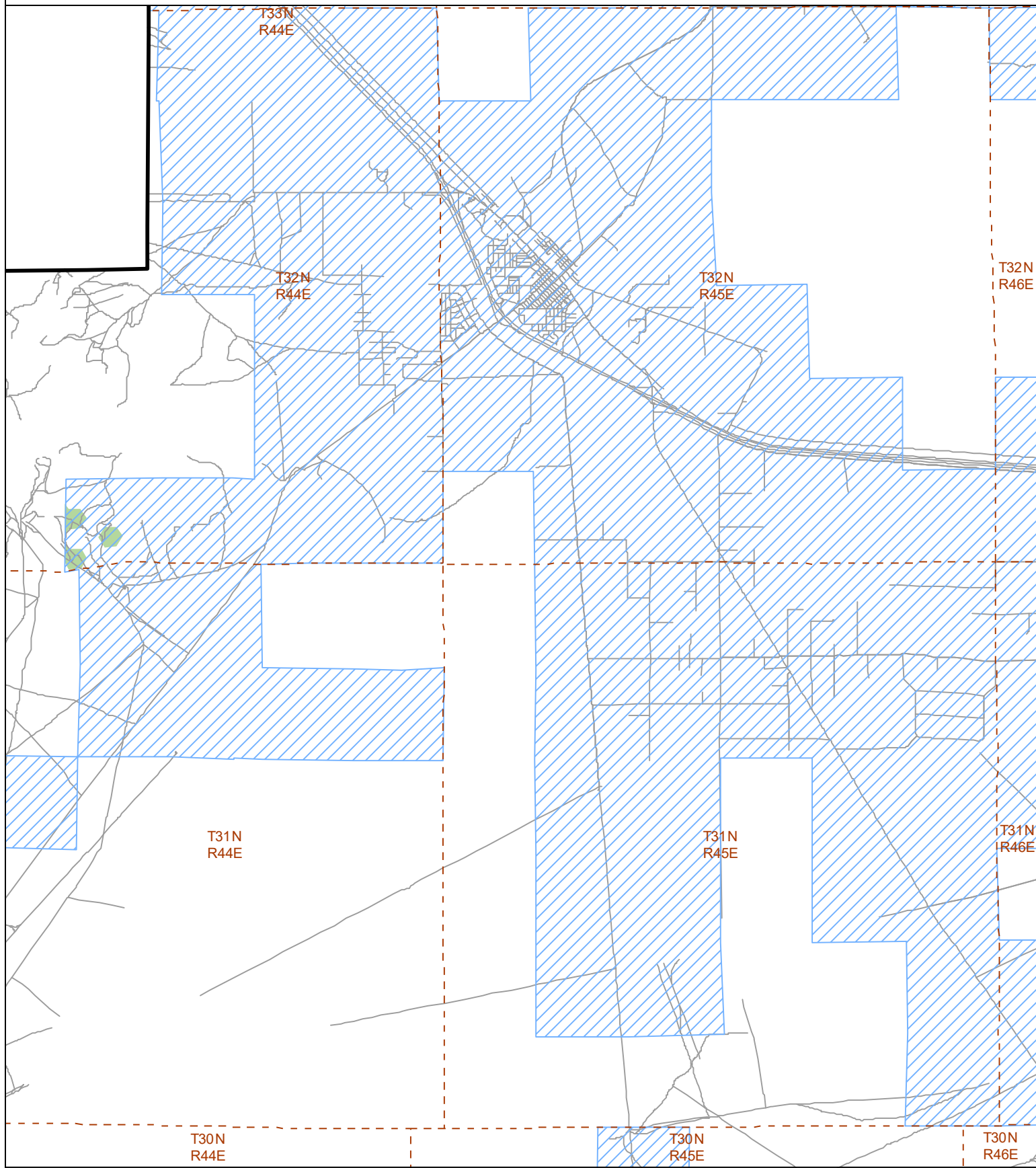
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Map prepared August, 2025



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Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



Scale = 1:72,000

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Map prepared August, 2025

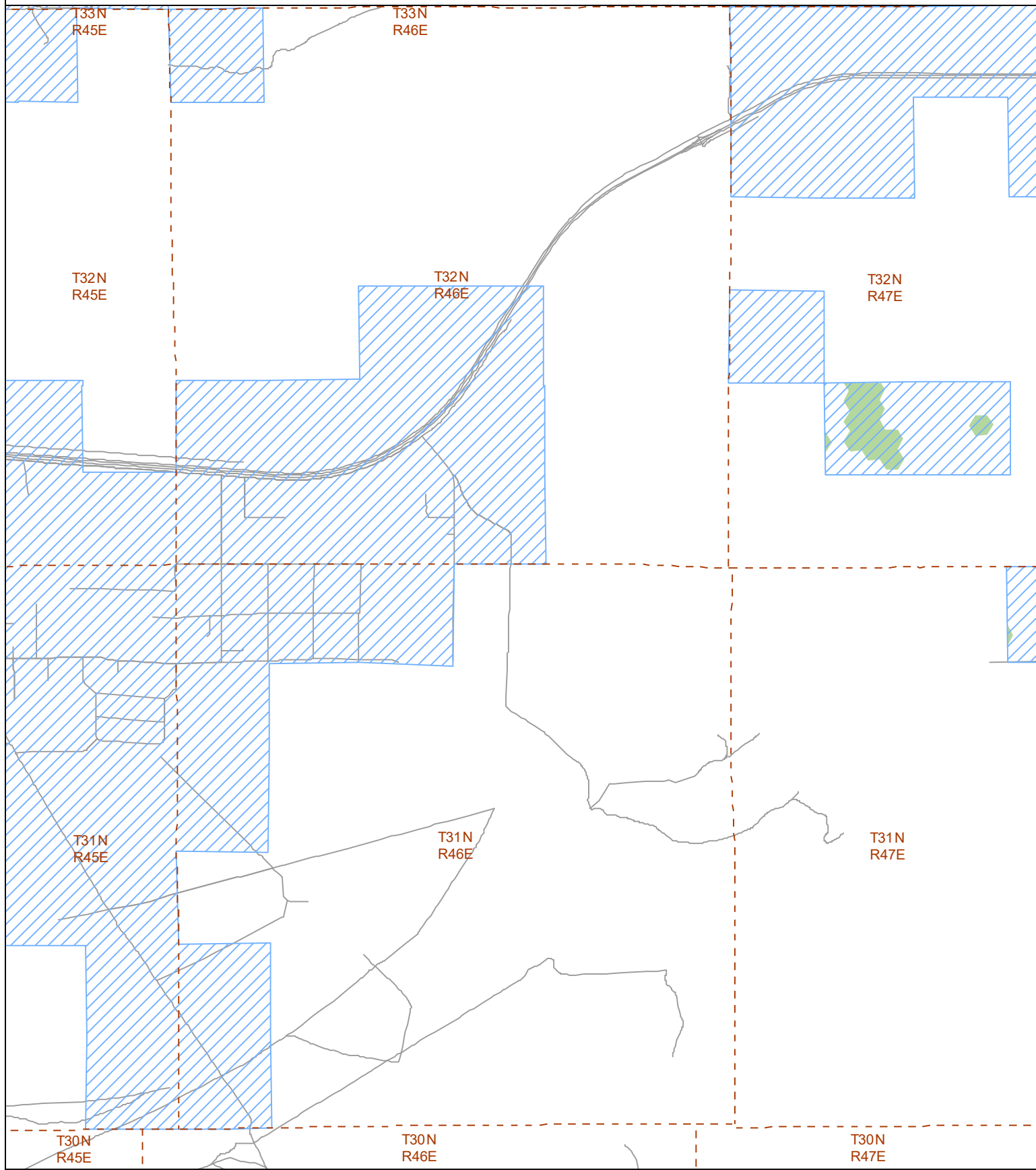


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LANDER COUNTY

1:72,000


MAP 3-c



Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

 PLSS Township Boundaries

 Streets



Scale = 1:72,000

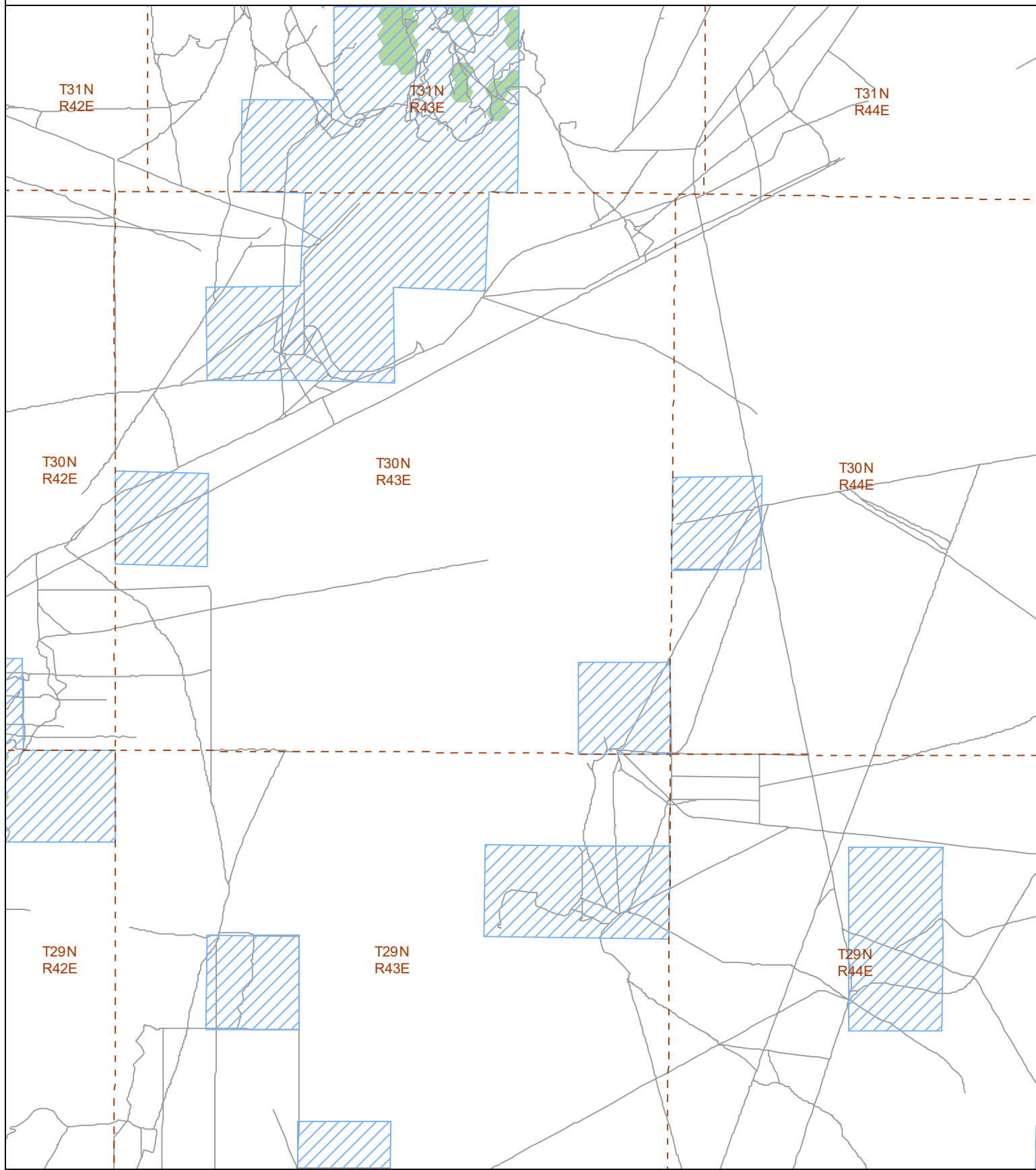
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Map prepared August, 2025



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Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



Scale = 1:72,000

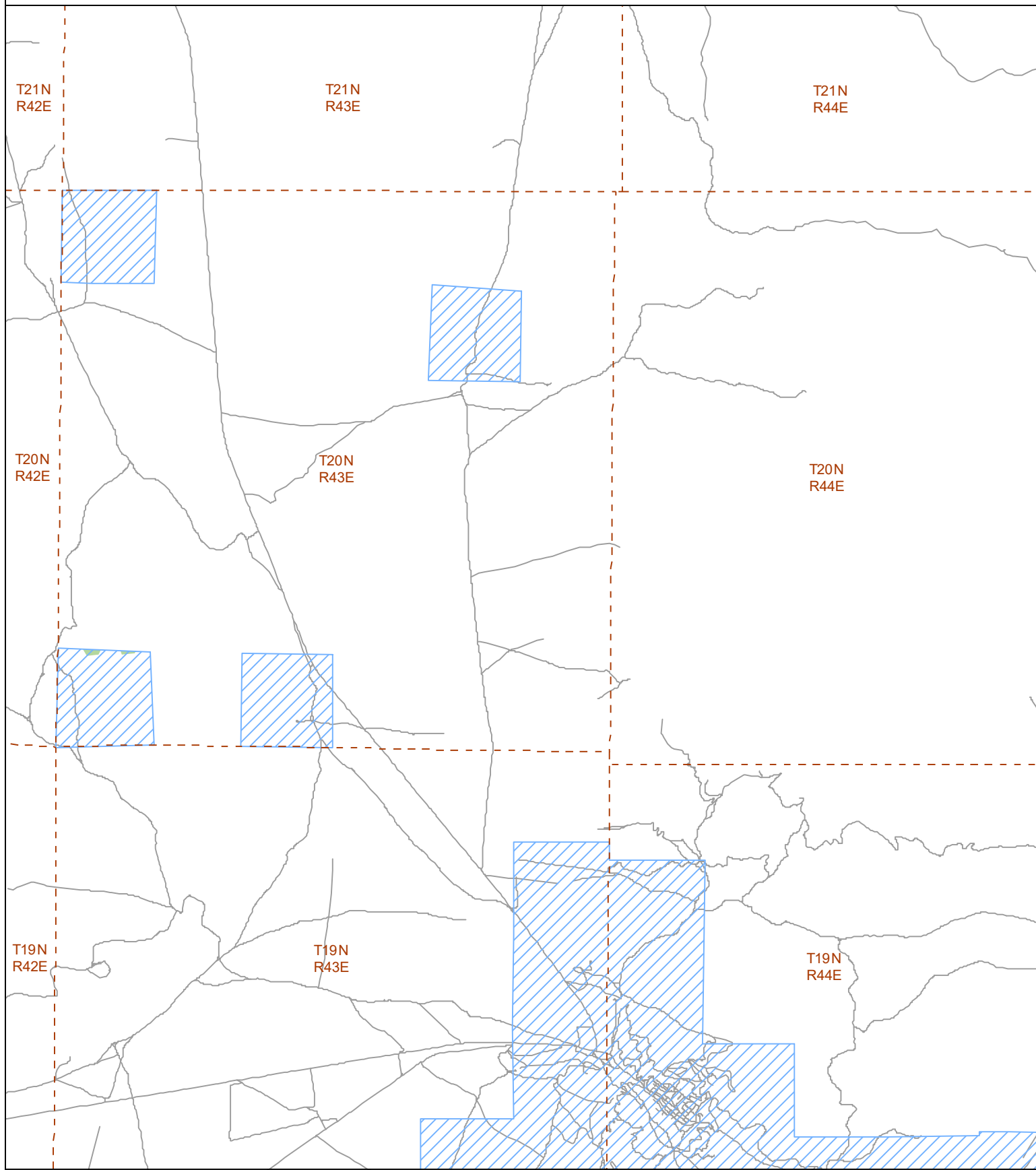
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Map prepared August, 2025



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Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



Scale = 1:72,000

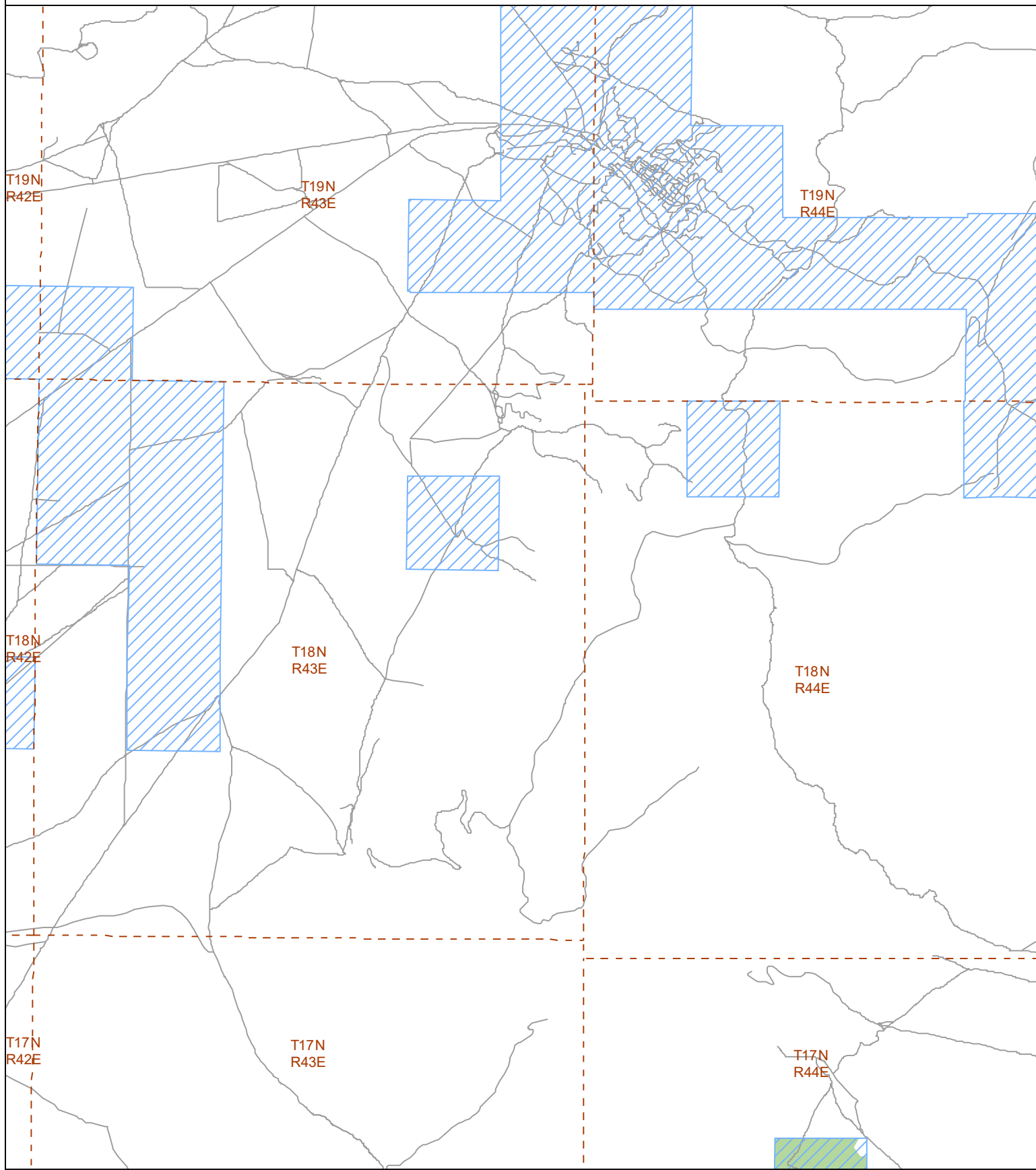
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Map prepared August, 2025



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Legend



PLR Area Seeking Relief



AT&T Exchange Boundary



County Boundary



PLSS Township Boundaries



Streets



Scale = 1:72,000

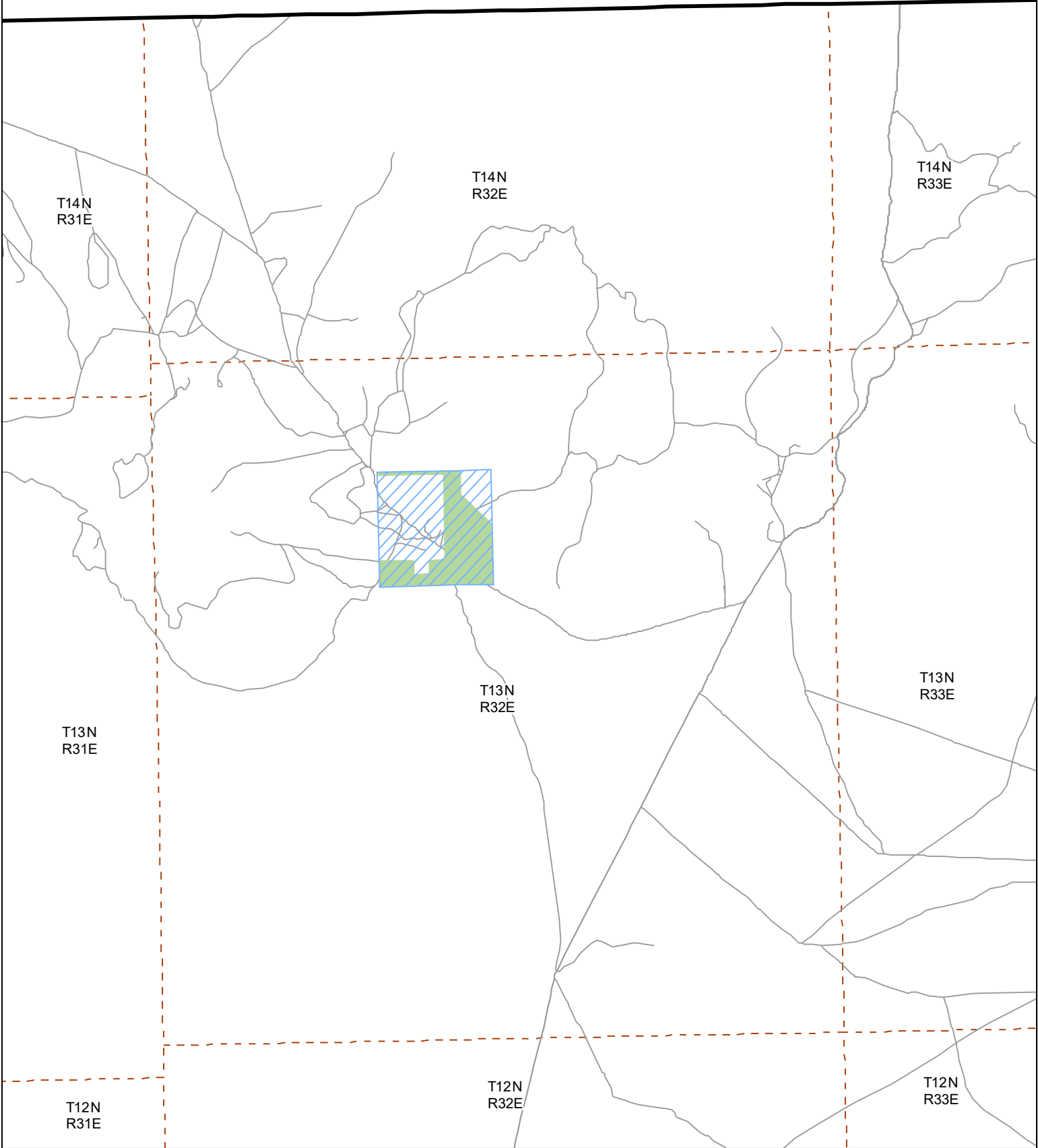
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Map prepared August, 2025








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Legend


-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

-  PLSS Township Boundaries
-  Streets

Scale = 1:72,000

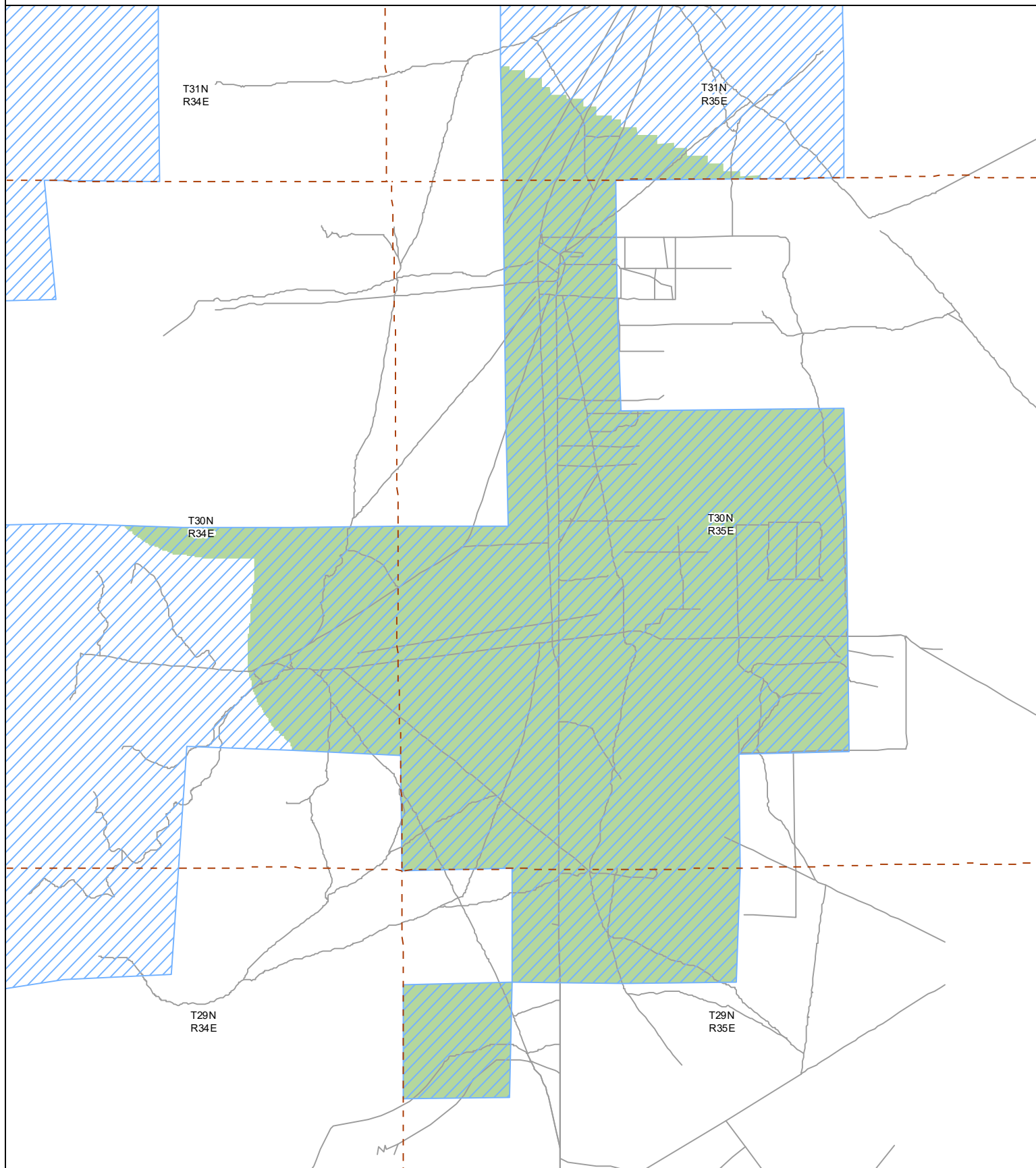
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Map prepared August, 2025




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
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Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

 T21N R25E PLSS Township Boundaries

 Streets



Scale = 1:72,000

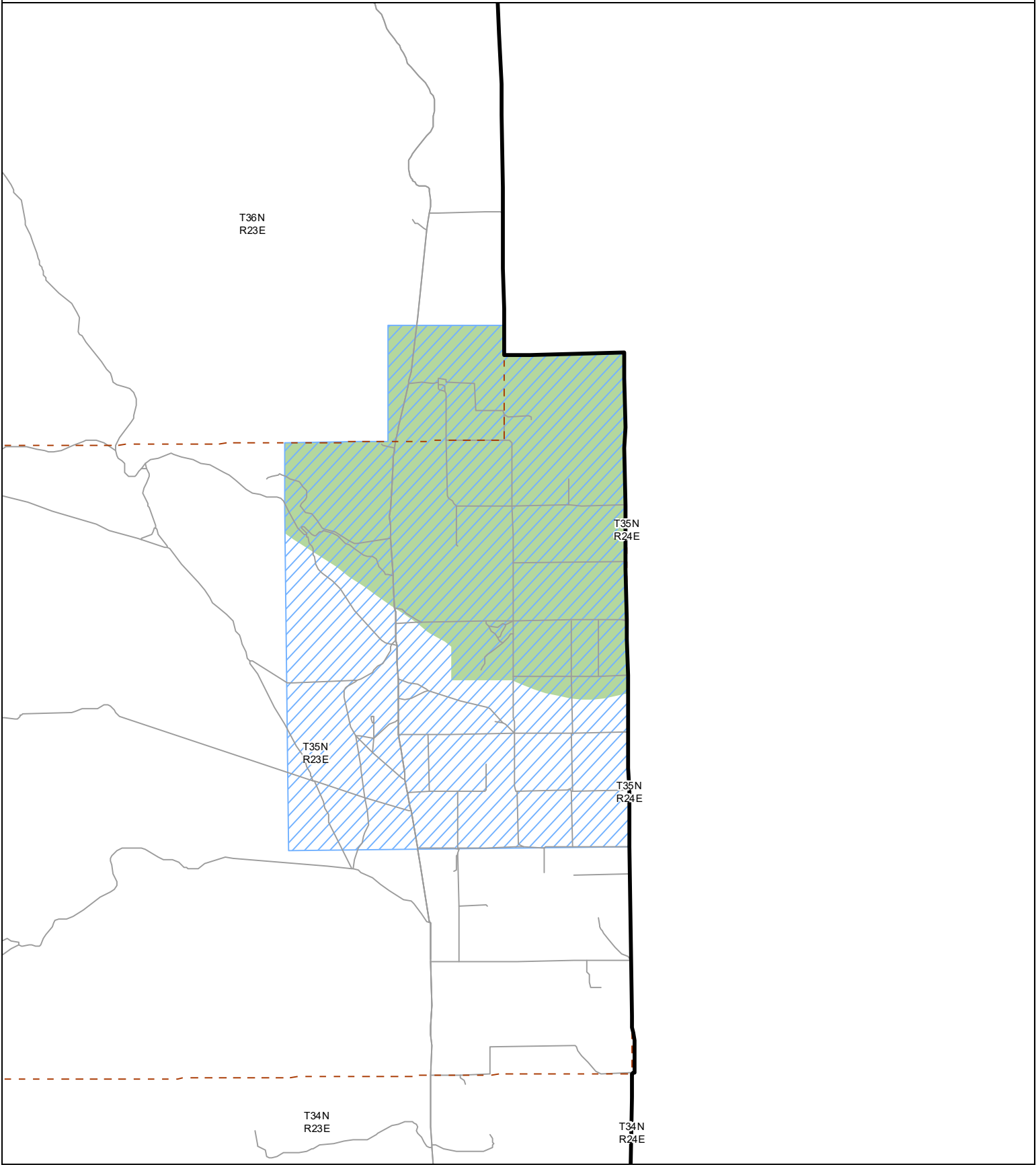
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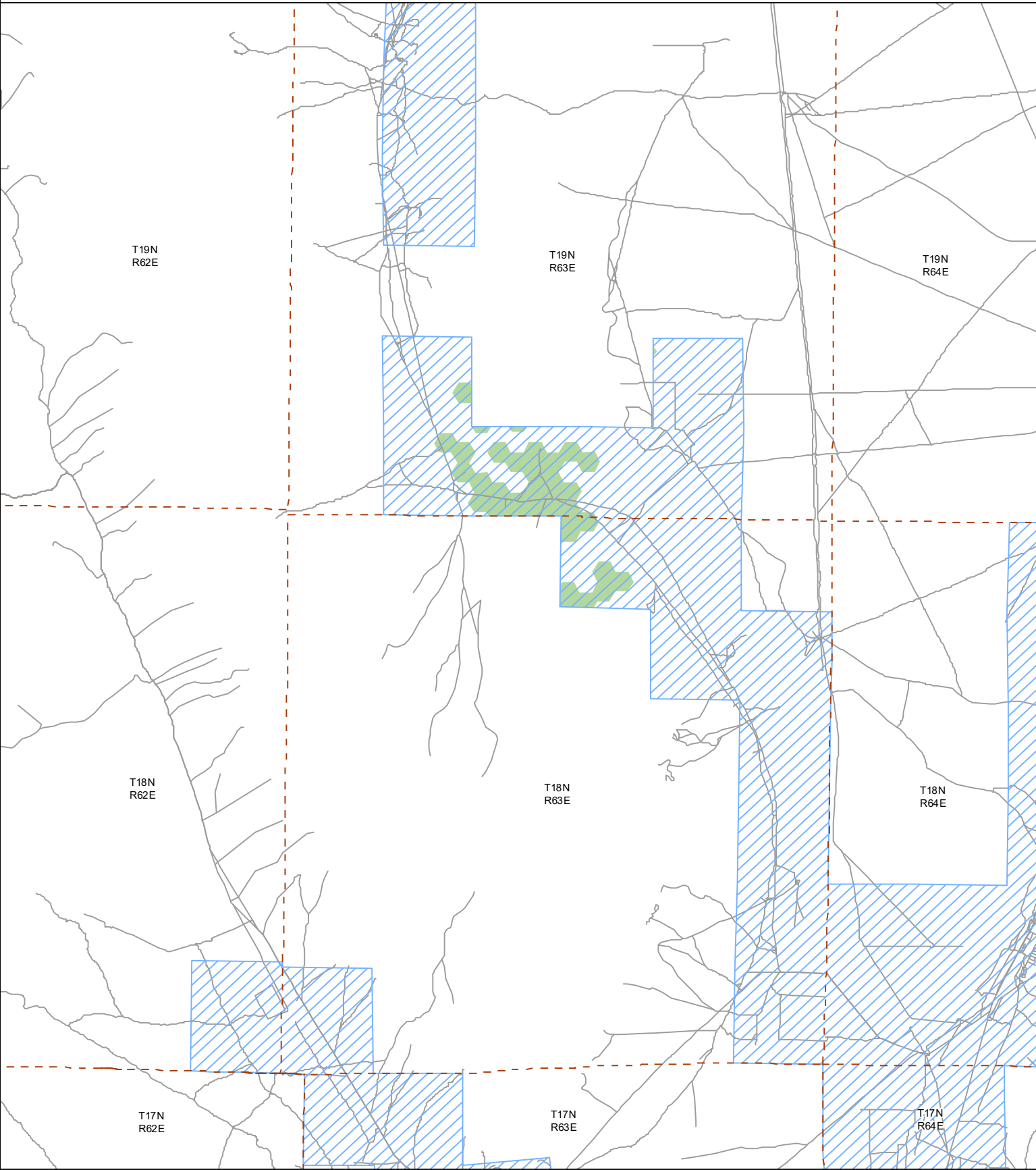
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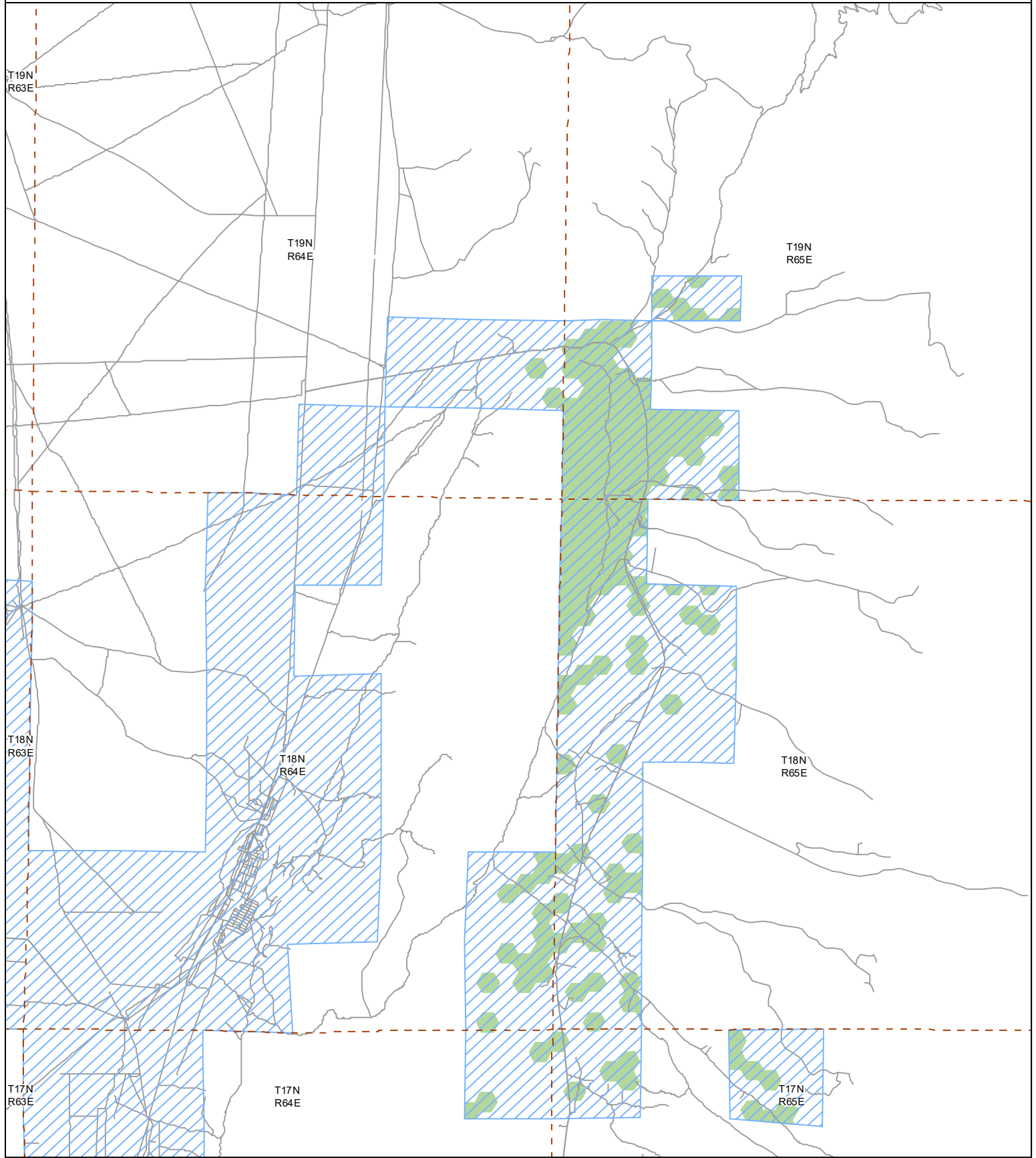


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Legend

PLR Area Seeking Relief

AT&T Exchange Boundary

County Boundary

T21N R25E

PLSS Township Boundaries

Streets

N

Scale = 1:72,000

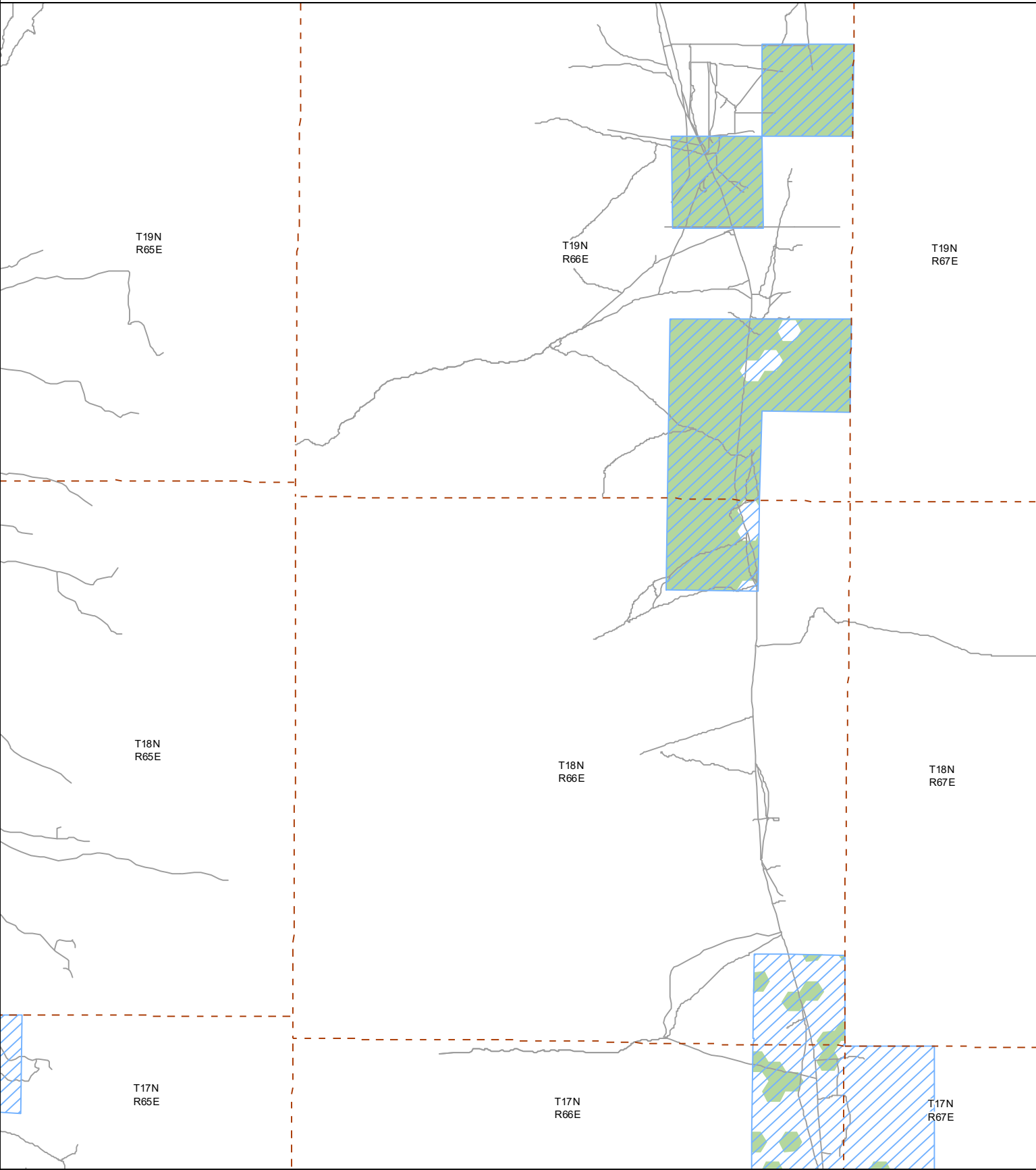
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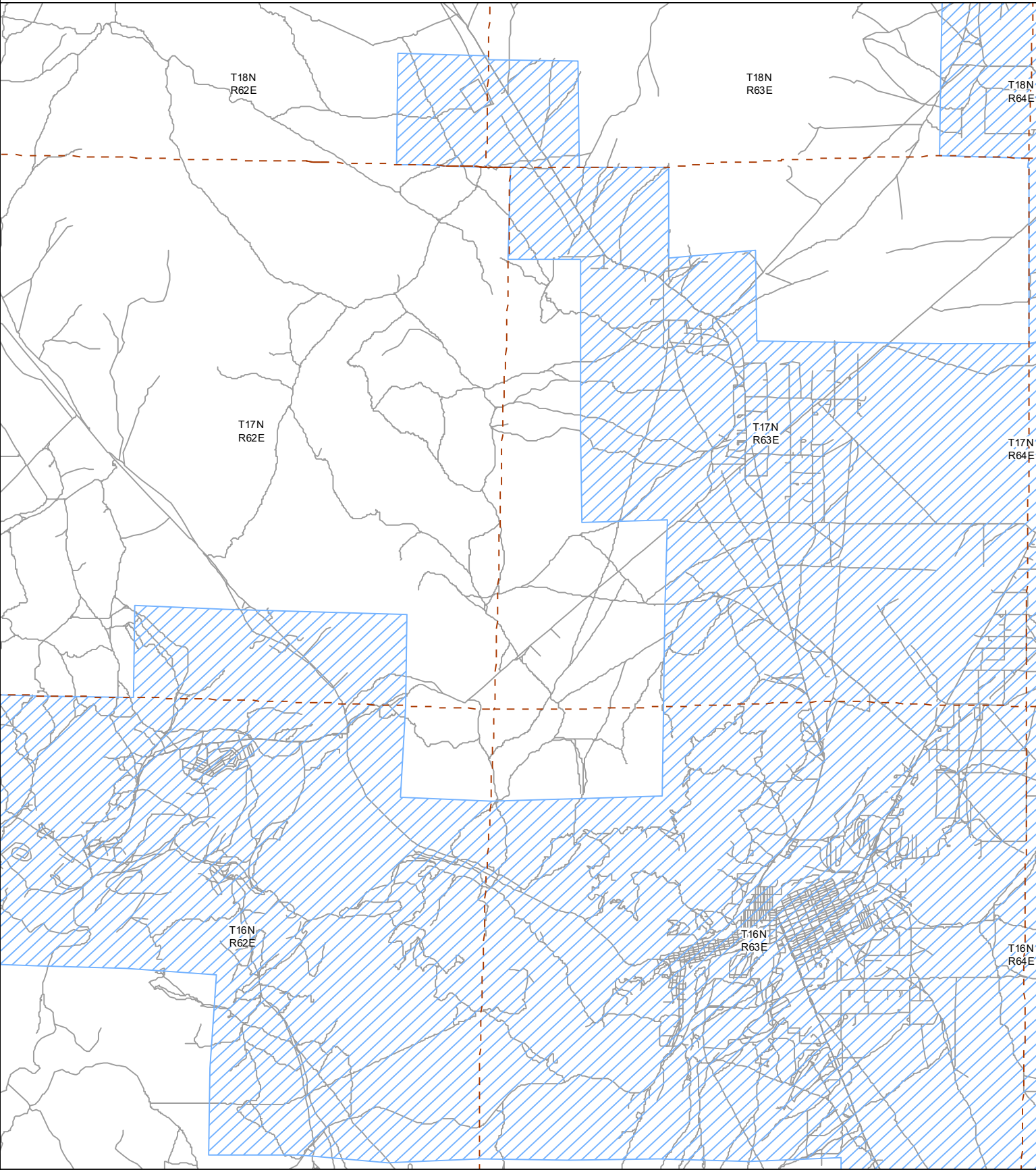
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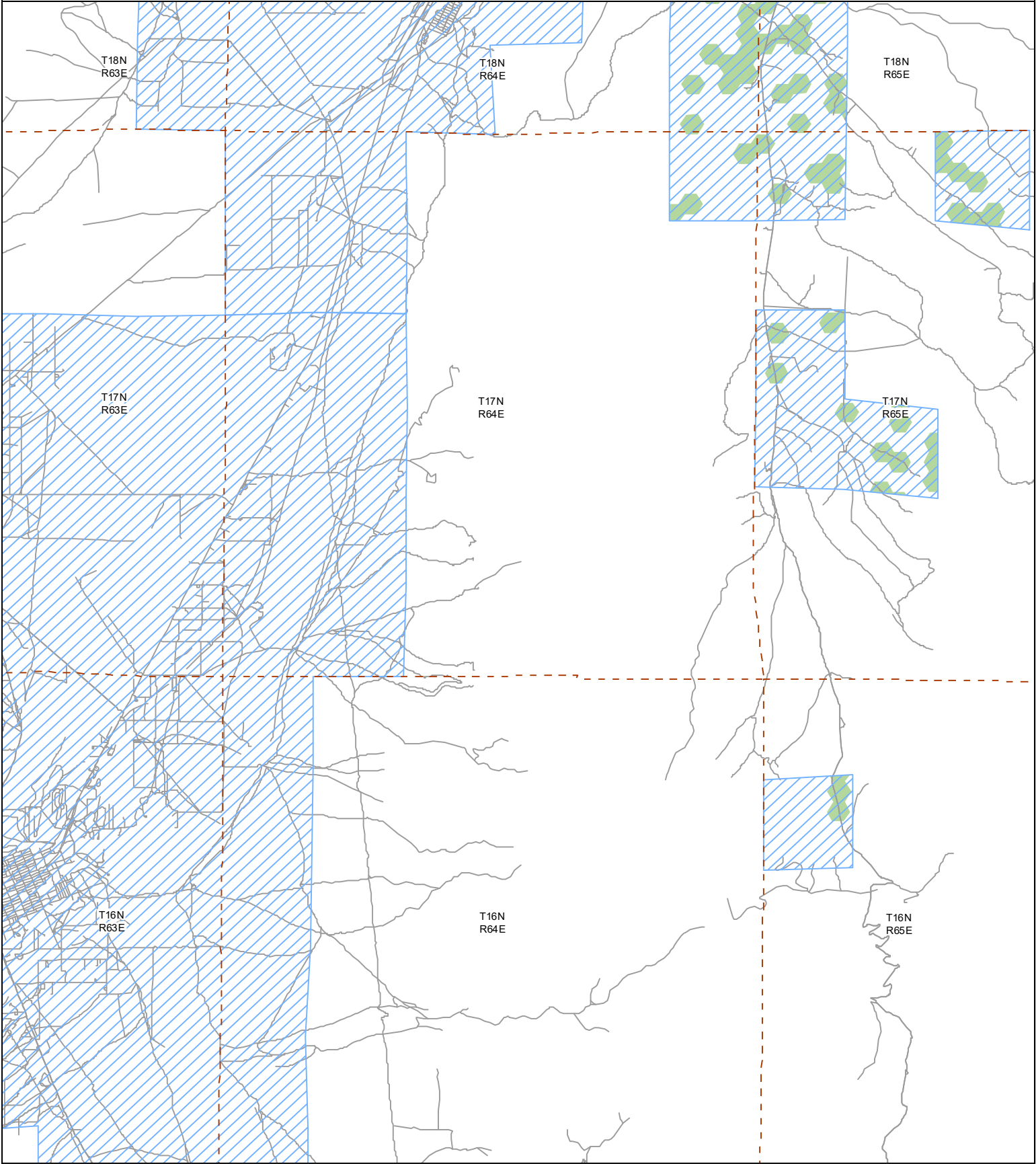
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
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




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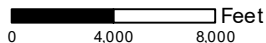
-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary

 PLSS Township Boundaries

 Streets



Scale = 1:72,000

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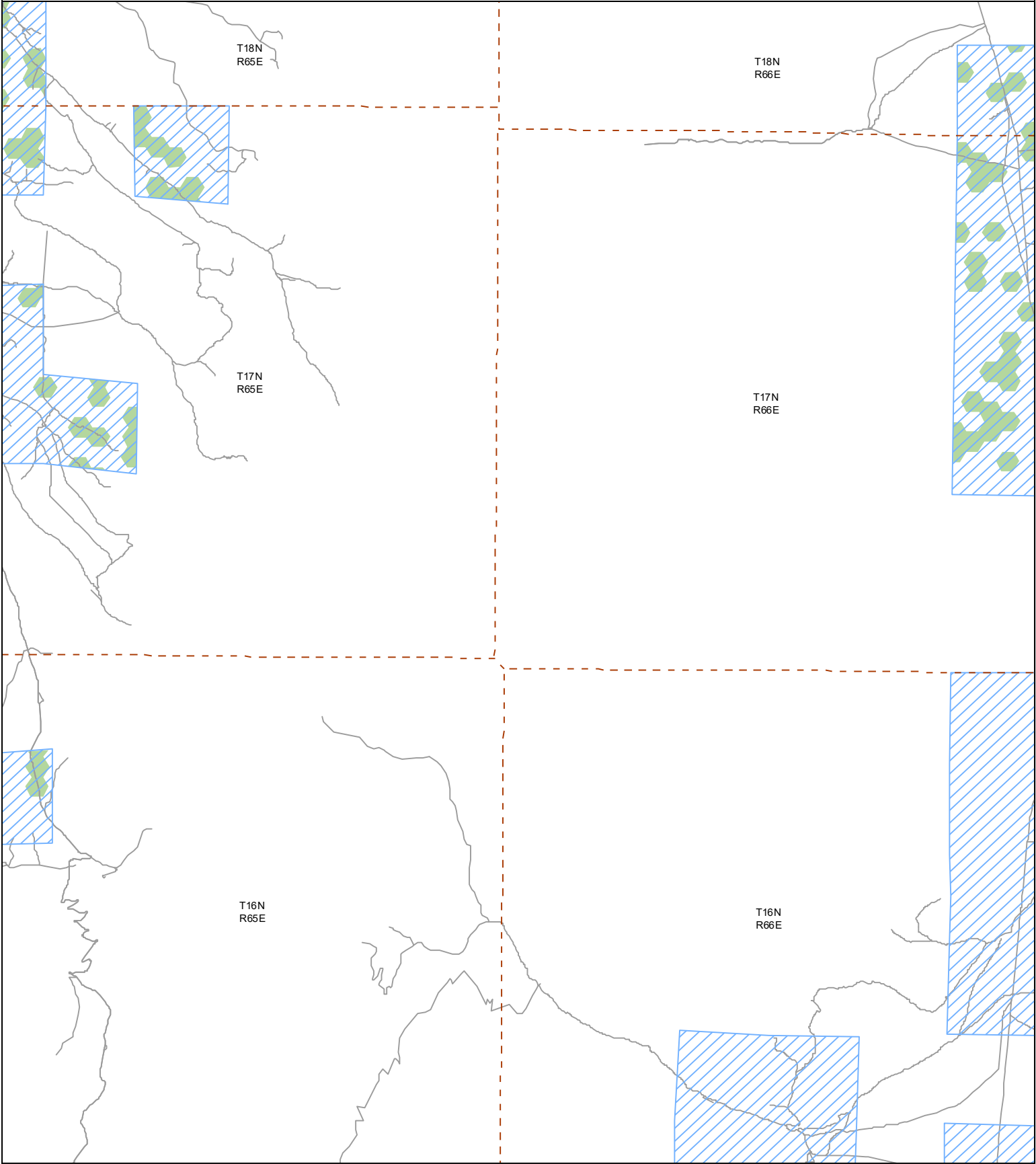
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

WHITE PINE COUNTY

MAP 4-a



Legend

-  PLR Area Seeking Relief
-  AT&T Exchange Boundary
-  County Boundary


-  T21N R25E PLSS Township Boundaries
-  Streets

N

Scale = 1:72,000

0 4,000 8,000 Feet

Map prepared August, 2025

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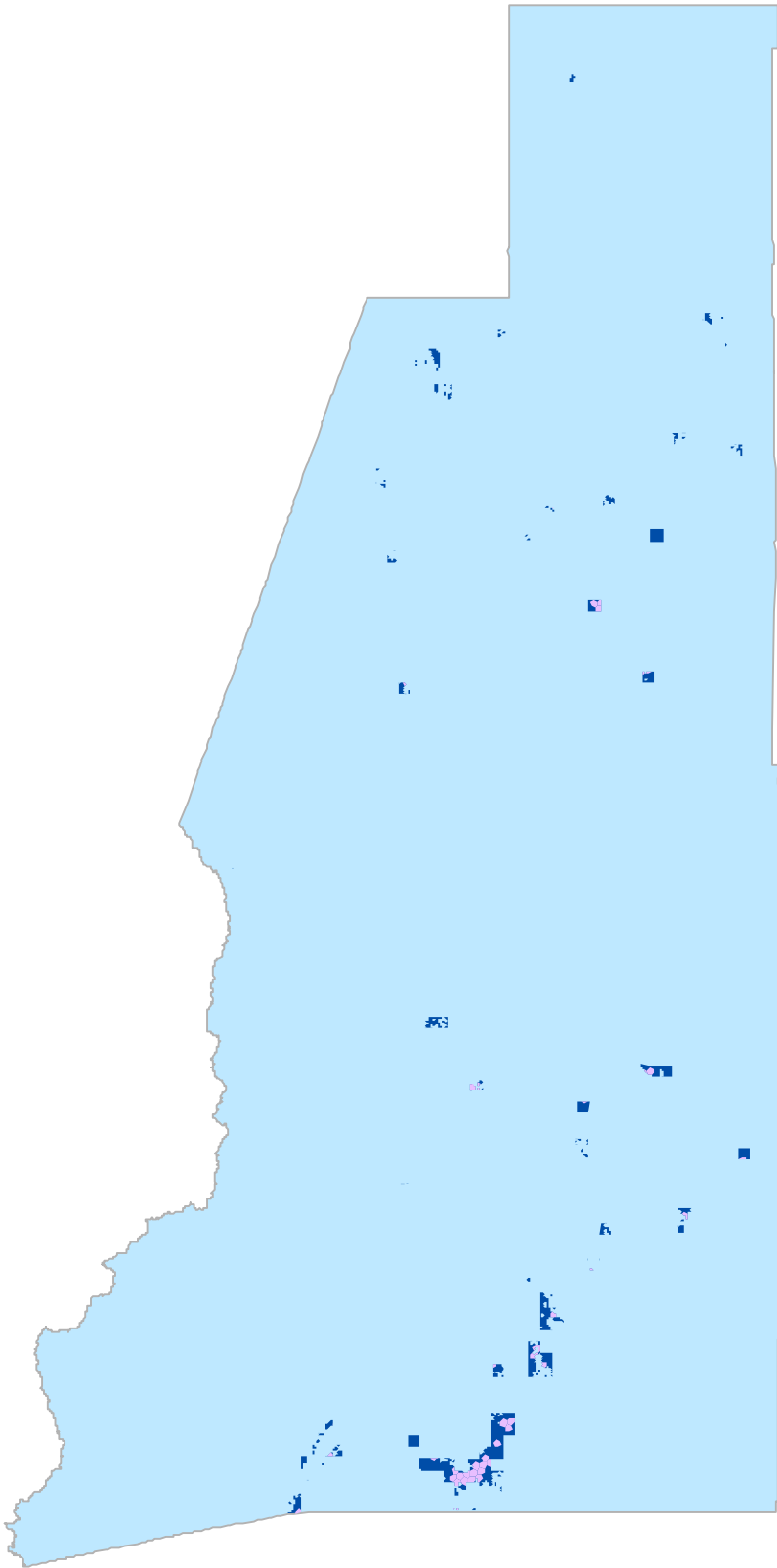
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Exhibit 5

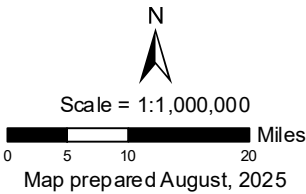
Coverage Maps of alternative voice service providers located in areas relief is requested


LANDER COUNTY

SATELLITE COVERAGE MAP



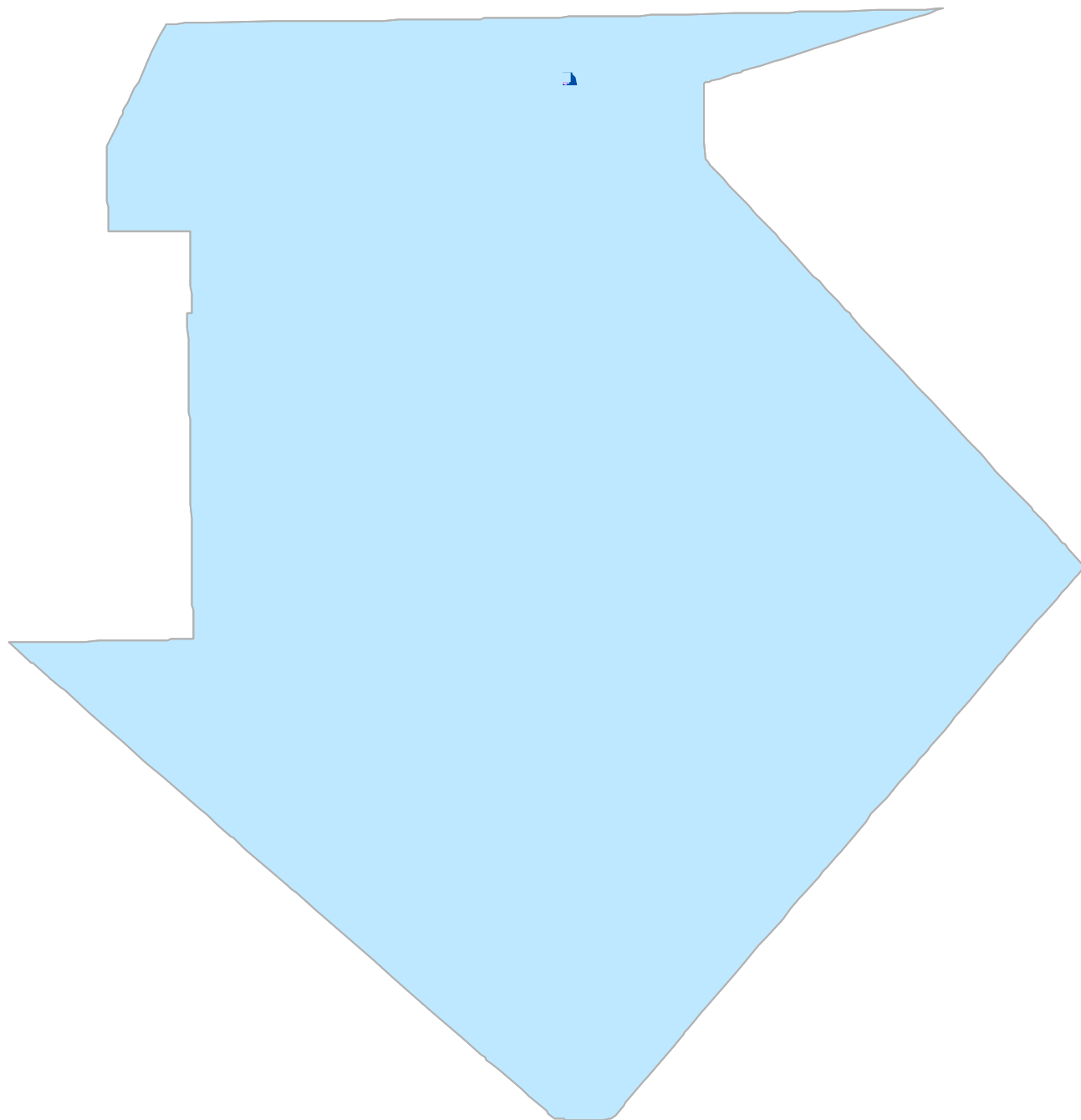
- Legend
- PLR Areas with coverage from at least 2 satellite providers
- PLR Areas with Broadband Service Locations having coverage from at least 2 satellite providers
- Areas with coverage from at least 2 satellite providers
- County Boundary









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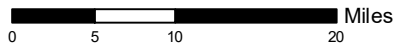


Legend

-  PLR Areas with coverage from at least 2 satellite providers
-  PLR Areas with Broadband Service Locations having coverage from at least 2 satellite providers
-  Areas with coverage from at least 2 satellite providers
-  County Boundary



Scale = 1:750,000



Map prepared August, 2025

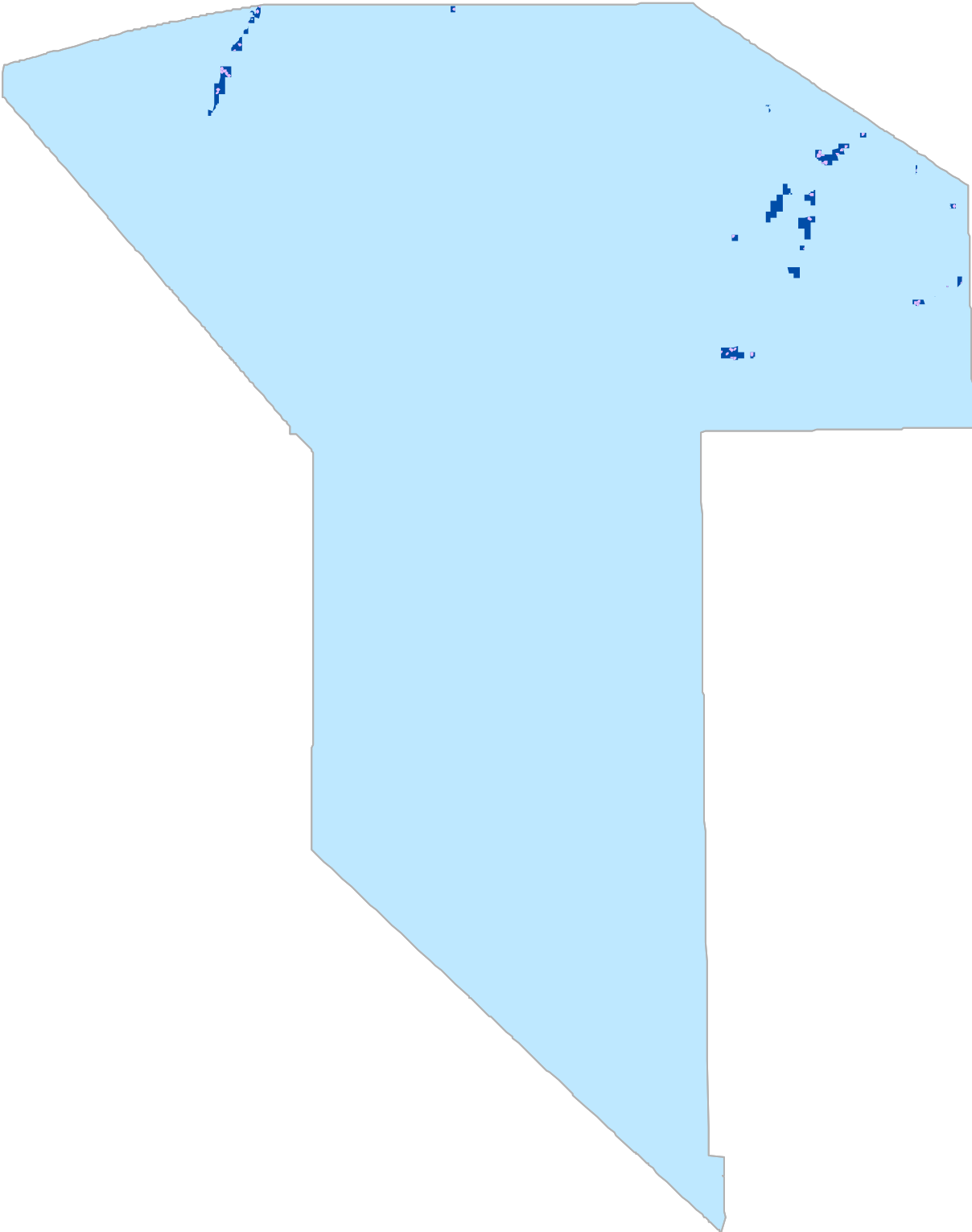


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NYE COUNTY

SATELLITE COVERAGE MAP



Legend

PLR Areas with coverage from at least 2 satellite providers

PLR Areas with Broadband Service Locations having coverage from at least 2 satellite providers

Areas with coverage from at least 2 satellite providers

County Boundary

N

Scale = 1:1,750,000

0

10

20

40

Miles

Map prepared August, 2025

AT&T

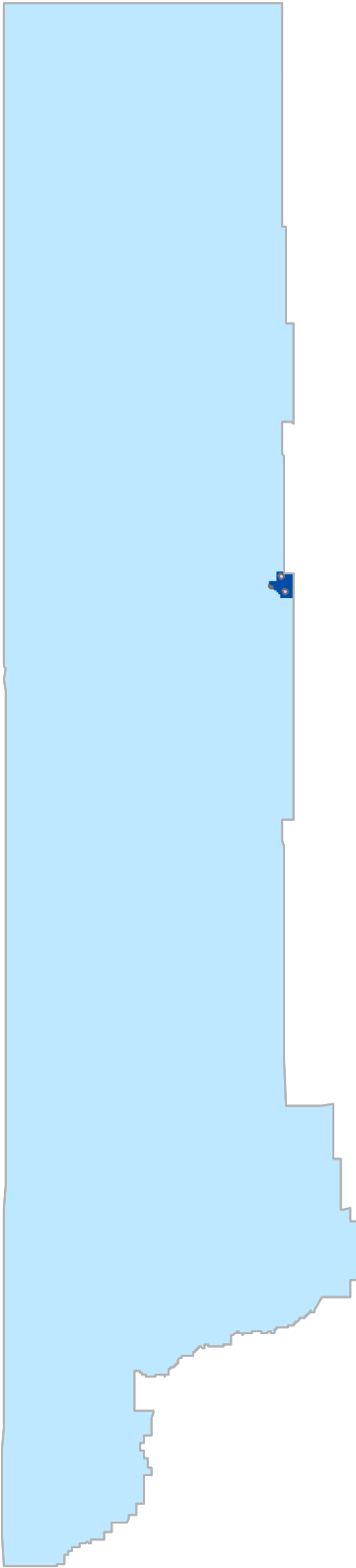
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WASHOE COUNTY


SATELLITE COVERAGE MAP





Legend

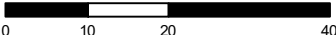
 PLR Areas with coverage from at least 2 satellite providers

 PLR Areas with Broadband Service Locations having coverage from at least 2 satellite providers


 Areas with coverage from at least 2 satellite providers

 County Boundary


Scale = 1:1,500,000


0 10 20 40 Miles

Map prepared August, 2025



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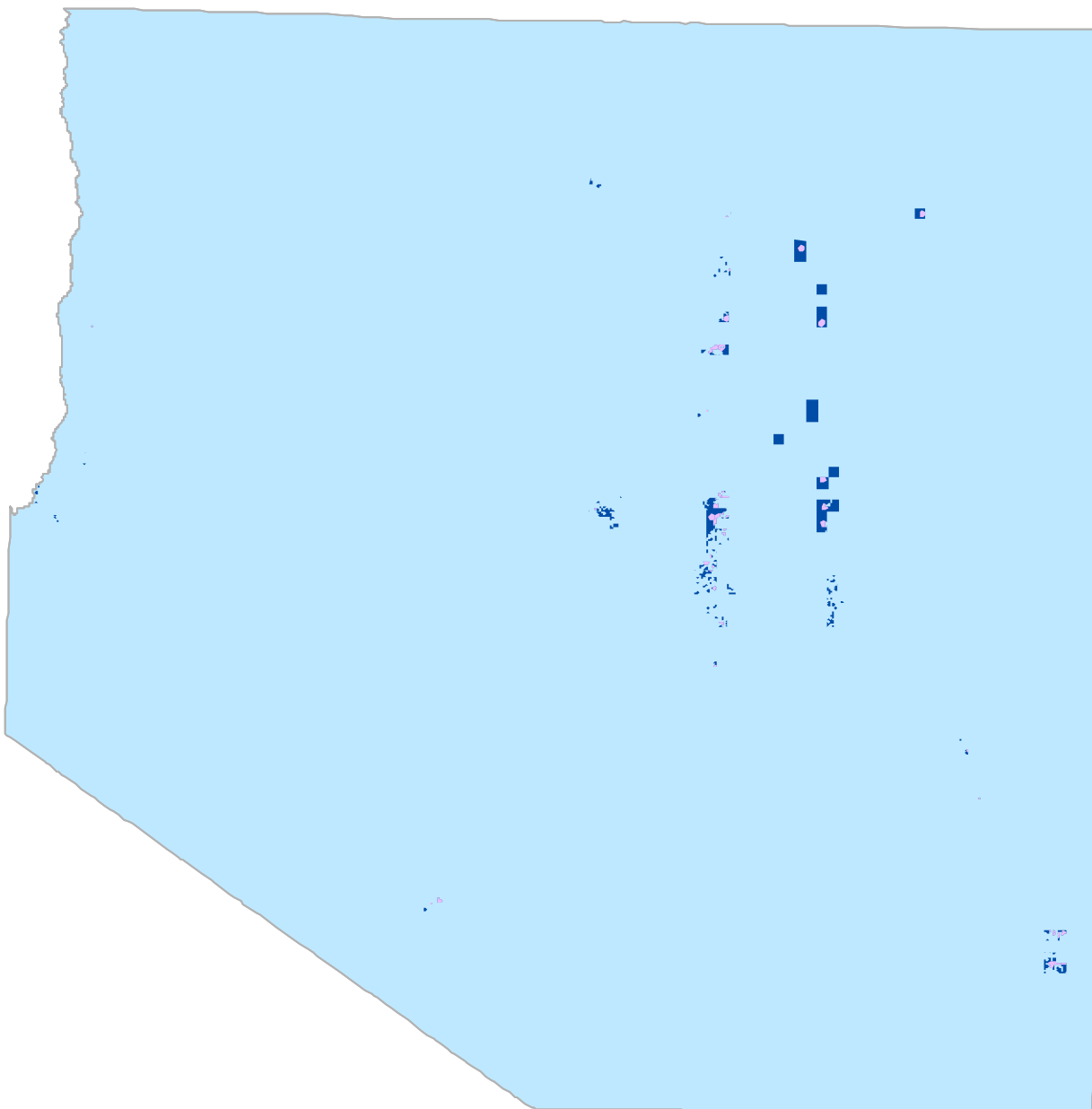


Exhibit 6

Declaration of Ty Shalley

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Ty Shalley, being duly sworn, deposes and states:

1. My name is Ty Shalley. I am employed by Michael Baker International LLC (“Michael Baker”) as a Geographic Information System (“GIS”) Specialist. My work address is 1375 Capital Blvd, Room 115, Reno, NV 89502. I am fully competent to make this affidavit and I have personal knowledge of the facts stated in this affidavit.
2. My work responsibilities include acquisition and maintenance of spatial data, data analysis, and cartographic representation.
3. AT&T Services, Inc. (“AT&T”) has retained Michael Baker to provide various GIS services for a number of AT&T entities including Nevada Bell Telephone Company, LLC d/b/a AT&T Nevada and AT&T Wholesale (“AT&T Nevada”).
4. Specifically, AT&T requested a mapping of satellite service coverage in Lander, Mineral, Nye, Pershing, Washoe, and White Pine counties for use in AT&T Nevada’s Application for a Change in its Provider of Last Resort Service Area (“Application”).
5. In preparing **Exhibits 1- 5** attached to the Application, I relied on a) satellite broadband coverage data available on the Federal Communications Commission’s (“FCC”) National Broadband Map, which is broken down by provider and technology type for

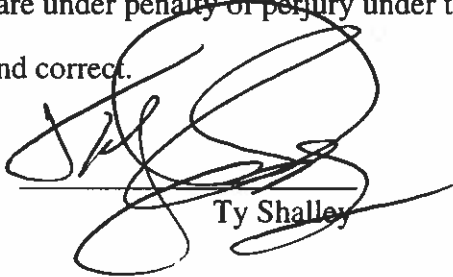
each state in the US, and b) satellite service information available on coverage maps accessible on the websites of Hughes Network Systems, LLC (“Hughesnet”) and Starlink – Space Exploration Technologies Corp. (“Starlink”),¹ which display coverage down to a specific street address and/or latitude/longitude coordinate.

6. For this analysis, I downloaded availability data for Hughesnet and Starlink in the form of .csv files listing each Broadband Serviceable Location (“BSL”) the provider could serve. These lists include an ID code for the Resolution 8, H3 hexagon in which they are located. I used this ID code to link this data to a Resolution 8, H3 hexagon grid I created using ESRI GIS software. Using information from both providers I was able to create a hexagon coverage showing service from the two satellite providers. This allowed me to display areas enabled for redundant satellite voice service. The satellite broadband coverage data is displayed using a standardized lattice of hexagonal polygons with an area of about 180 acres. The latest release of this data was used, which had been updated as of December 31, 2024.
7. Based on the satellite service information available on coverage maps accessible on the websites of Hughes Network Systems, LLC and Starlink I interpreted that coverage is available for the entire state of Nevada from both companies and therefore would be available throughout all Provider of Last Resort Service (“POLR”) areas that are the subject of this docket.
8. I prepared **Exhibit 5** by first overlaying the hexagon data onto a map of AT&T Nevada’s POLR areas to show satellite availability across all BSLs identified by the FCC. I also placed shading on the map to show the satellite availability displayed on Hughesnet and Starlink’s websites for each county. The resulting coverage maps demonstrate that all POLR areas that are the subject of this application are serviced by at least two satellite providers.

¹ See <https://www.hughesnet.com/availability/> and <https://www.starlink.com/map>.

1 9. I hereby verify that the maps attached as **Exhibits 1-5** to the Application accurately
2 reflect AT&T Nevada's exchange areas with POLR obligations, the satellite availability
3 data downloaded from the FCC's National Broadband Map site, and coverage
4 information on Hughesnet and Starlink's maps.

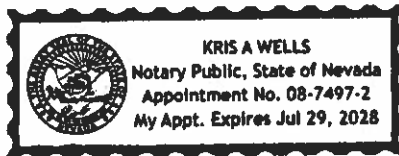
5
6 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is
7 true and correct.

8 
9 Ty Shalley

29 AUG 25
Date

10
11
12 SUBSCRIBED AND SWORN BEFORE ME this 29th day of August, 2025.





Notary Public in and for
the State of Nevada
My commission expires:

7-29-28

Exhibit 7

Samples of Customer Notifications

Consumer Bill Page message:

IMPORTANT NOTICE

AT&T Nevada filed an application with the Public Utilities Commission of Nevada (PUCN) requesting modification to its regulatory designation as a provider of last resort (POLR) in portions of its service territory. This filing will update POLR areas based on updated coverage information for the state of Nevada.

It's important to note that this filing does not change your current phone service. AT&T has been providing service in Nevada for over 100 years, and we remain committed to delivering high-quality voice and internet services for many years to come.

The PUCN will hold consumer sessions in Lander, Mineral, Nye, Pershing, Washoe and White Pine Counties, where you can ask questions or share your comments about the application. The PUCN will issue a public notice with the details of the consumer sessions, including the time, date and location. You're welcome to attend any of the sessions.

For more information, go to: att.com/nevadapolr.

Business Customer message:

<COMPANY NAME>

ATTN: TELECOMMUNICATIONS MANAGER

<STREET ADDRESS>

<CITY>,<STATE> <ZIP>--<PLUS4>

<BTN> (last 4 digits exposed)

Dear Telecommunications Manager,

Learn about AT&T's recent application to the Public Utilities Commission of Nevada.

What's happening

AT&T has filed an application with the Public Utilities Commission of Nevada (PUCN) requesting to modify its designation as a POLR in portions of its service territory. No changes are being made to the existing phone service as a result of this filing.

Why we're doing it

AT&T is committed to bringing Nevadans the latest modern communications. Thanks to recent investment and additional investment from other providers, most consumers now have access to multiple choices for how they connect. As a result of this investment, AT&T is seeking to update its POLR service areas based on the availability of alternative voice service.

FREQUENTLY ASKED QUESTIONS ABOUT THIS APPLICATION

How will I know if my AT&T phone service will be impacted?

No changes are being made to your phone service because of this filing.

Will AT&T Nevada customers lose service?

No AT&T customer in Nevada will be left without service. To fulfill existing regulatory requirements, we are seeking to change POLR service areas in light of the availability of alternative voice service. AT&T has provided service in Nevada for over 100 years and looks forward to continuing our high-quality voice and Internet for many years to come.

Will Nevada consumers have access to 911 services?

Yes. Nevada consumers will continue to have access to voice services including 911 and emergency services.

For the latest information, go to: att.com/nevadapolr.

Exhibit 8

Sample of Letter being sent to PSAPs



Omar Saucedo
Director
External Affairs

AT&T Nevada
6750 Via Austi Pkwy
Las Vegas, NV 89119

T: 702-290-5358
os706h@att.com

September 5, 2025

PSAP CONTACT
PSAP ADDRESS
PSAP CITY STATE ZIP

Re: AT&T Nevada Provider of Last Resort Designation

Dear PSAP CONTACT:

AT&T Nevada has filed an application with the Public Utilities Commission of Nevada ("PUCN") requesting relief from its designation as a provider of last resort ("POLR") in portions of its service territory in Lander, Nye, Mineral, Pershing, Washoe and White Pine Counties.

AT&T Nevada is required by law to conduct a meeting regarding the application with each Public Service Answering Point ("PSAP")/law enforcement agency located within the area where relief is sought. We will be contacting you soon to schedule a meeting.

AT&T Nevada looks forward to continuing to serve Nevada, including the areas where it seeks POLR relief, with high quality voice and internet services. The application filed with the PUCN simply seeks to remove a regulatory designation that was placed on AT&T Nevada and not its competitors.

The PUCN will be conducting consumer sessions in each impacted county regarding the application. Customers may attend the consumer sessions to make inquiries or comments concerning the application. The PUCN will issue a public notice identifying the time, date, and location of the consumer sessions.

Maps showing detail where relief is being requested, an explanation of POLR, and a copy of the complete filing, can be found at <https://www.att.com/nevadapolr>.

If you have any questions concerning this matter please call me to discuss. I can be reached at (702) 290-5358.

Sincerely,

Omar Saucedo
Director – External Affairs
AT&T Nevada

Exhibit 9

Draft Public Notice

PUBLIC UTILITIES COMMISSION OF NEVADA
DRAFT NOTICE
(Applications, Tariff Filings, Complaints, and Petitions)

Pursuant to Nevada Administrative Code (“NAC”) 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(4)(a)):

Application for Relief from Designation as a Provider of Last Resort in certain areas in Lander, Mineral, Nye, Pershing, Washoe and White Pine Counties pursuant to NRS 704.68886.

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

Nevada Bell Telephone Company, LLC d/b/a AT&T Nevada and AT&T Wholesale

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled **AND** the effect of the relief or proceeding upon consumers (see NAC 703.160(4)(c)):

Pursuant to Nevada law, AT&T Nevada filed an application with the PUCN requesting relief from its regulatory designation as a provider of last resort in portions of its service territory in Lander and White Pine Counties. AT&T Nevada will continue to provide customers with high quality voice and internet services.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute (“NRS”) 704.069(1)¹:

The PUCN will be conducting a consumer session regarding the application in Lander Mineral, Nye, Pershing, Washoe and White Pine Counties pursuant to NRS 704.68886.

If the draft notice pertains to a tariff filing, please include the tariff number **AND** the section number(s) or schedule number(s) being revised.

N/A.

¹ NRS 704.069 states in pertinent part:

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110 inclusive, in which:
 - (a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and
 - (b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant’s annual gross operating revenue, whichever is less.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the Public Utilities Commission of Nevada by electronic filing and also to the following parties at the recipient's current electronic mail address, properly addressed to:

Ernest Figueroa, Esq.
Consumer Advocate
Bureau of Consumer Protection
100 N. Carson Street
Carson City, NV 89701
BCPServ@ag.nv.gov

Don Lomoljo, Esq.
Staff Counsel
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701
pucn.sc@puc.nv.gov

Manny Lopez
Manager, Resource and Market Analysis
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701
lopez@puc.nv.gov

Dated this 5th day of September 2025



David Collier
Lead, Regulatory Relations