

<b>Issue</b>	<b>CMTE</b>	<b>SFBP</b>	<b>PMSA</b>
<b><i>SUBSTANTIVE</i></b>			
Basis for Ratesetting	Review Pilotage Costs and Expenses from time to time (1/13 lang)	<b>Establish a fair, just, and reasonable rate to generate sufficient resources (1/13 Jt)</b>	<b>Establish a fair, just, and reasonable rate to generate sufficient resources (1/13 Jt)</b>
Formula	No Formula Included (1/13 lang)	<b>Include Formula (1/13 Jt)</b>	<b>Include Formula (1/13 Jt)</b>
Formula Factors	“Shall consider” Expenses + TNI	<b>Expenses + TNI*# of Pilots</b>	<b>Expenses + TNI*# of Pilots</b>
Additional Factors	Unincluded – Subj to Rulemaking	<b>Included (1/13 Jt)</b>	<b>Included (1/13 Jt)</b>
<b><i>PROCEDURAL</i></b>			
Pre-Petition Notice	Notice of Intent to File Petition (10/26 notes)	Agree	Agree
Petition	Petition (1/13 lang)	Agree (note below on joint petition).  Suggested minimum time between filings – 1yr	Agree w Petition to Start Process  Agree
Note for Stipulation or Joint Petition	Notice and ALJ process (10/26 notes)	Agree. There should be a streamlined process.	Agree to further description of pathway.
Post-petition/Pre-hearing	ALJ Assigned (10/26 notes)	Agree	Agree
	ALJ Discovery, Prehearing Conference, Evidentiary Dispute Resolution (10/26 notes)	Agree  Agree schedules and timelines should be identified with a focus on timely resolution.	Agree  Clarify Briefing Schedules pre-hearing
	ALJ Proposed Decision, Findings, (10/26 notes)	Agree	Agree
	ALJ Proposed Decision for presentation at Board Hearing (10/26 notes)	Agree. However, SFBP would characterize “Board Hearing” as	Oppose. ALJ Decision should be finalized after ALJ Hearing.

		“Board Review of ALJ Proposed Decision”	PMSA Opposed to Board Hearing and Board Decision.
Board Hearing	Board Hearing conducted by an ALJ (1/13 lang)	Agree (see above)	Oppose.
	ALJ prepare a proposed decision at the conclusion of the hearing (1/13 lang)	Agree	Oppose.
Hearing Procedures	Hearings are Open under Bagley-Keene and evidence kept (1/13 lang)	Agree	Agree.
Board Action on Recommendation	Board action to Approve, adjust, Remand, Disapprove (10/26 notes)(1/13 lang)	Agree	Oppose.  Open to further discussion regarding Board input, comment, consultation on issues of limited scope.
CalSTA Secretary Final Approval	Secretary review with deference to approve or disapprove (10/26 notes), or limited to review of conclusions regarding adjustments (1/13 lang)	Agree  Agree  Disagree  Open to consider	Agree with Secretary Final approval.  Disagree with deference as described to Board.  Agree with deference to findings and conclusions of ALJ.  Secretary review should focus on approval with scope limited to narrow issues of disagreement, corrections.