

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



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Petition to Adopt, Amend, or Repeal a
Regulation Pursuant to Cal. Pub. Util. Code
§ 1708.5, Specifically to Review the
Assessment of Surcharges for the
Commission's Public Policy Programs with
Respect to Prepaid Wireless Services

Petition 09-12-018
(Filed 12/11/09)

**JOINT RESPONSE OF THE UTILITY REFORM NETWORK (TURN) AND
DISABILITY RIGHTS ADVOCATES TO THE VERIZON WIRELESS
PETITION FOR RULEMAKING**

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I. INTRODUCTION

In accordance with Rule 6.3 of the Rules of Practices and Procedures, The Utility Reform Network (TURN) and Disability Rights Advocates (DisabRA) jointly file this response to Verizon Wireless' Petition for Rulemaking regarding the assessment of surcharges for Public Policy Programs with respect to prepaid wireless service. TURN/DisabRA recognize the importance of some of the issues raised in Verizon Wireless' Petition, but believe that it is inappropriate to address these issues in isolation when the Commission is already engaged in a comprehensive review of the Public Policy Programs in R.06-05-028 (the PPP Proceeding). To the extent that issues raised in the Petition are appropriate for consideration by the Commission, they should be incorporated into the PPP Proceeding, for the reasons discussed in detail below.

II. TO THE EXTENT THE COMMISSION ADDRESSES THE APPLICATION OF PPP SURCHARGES TO PREPAID LIFELINE, IT SHOULD BE DONE IN THE CONTEXT OF R.06-05-028

Through the PPP Proceeding, the Commission is currently engaged in a broad review of issues concerning, among other things, the interplay between wireless telecommunications service and the LifeLine program. This pending proceeding is addressing multiple questions that are also touched on in Verizon Wireless' pending Petition for Rulemaking, including the overall health and status of the fund supported by PPP surcharges and the potential expansion of the LifeLine program to include a wireless option. While many of the issues raised in the Petition are appropriate for resolution by the Commission, they are best addressed in the context of the broader proceeding so that policymakers, carriers, and consumers can all evaluate the various implications of the policy questions and consider solutions that take into account the many factors of the evolving telecommunications landscape.

A. Addressing the Process for Calculating Prepaid Contributions to PPP Surcharges Without Broad Context is Problematic

The Verizon Petition asks the Commission to develop guidelines for calculating and collecting PPP surcharges for prepaid wireless telecommunications users.¹ TURN/DisabRA

¹ At several locations, the Petition suggests that it might be appropriate to excuse consumers using prepaid wireless service from paying into the fund. This result would be an improper application of the law, including the

agree that such a process would be useful to ensure that all wireless carriers, using all forms of service, fairly and appropriately contribute to the fund. However, as set forth below, issues relating to the health of the fund are already under review in the PPP proceeding, as are numerous other general issues regarding the Lifeline program. If the Commission were to open a separate proceeding carving out the single issue of developing guidance for prepaid wireless PPP surcharges, this issue would demand disproportional focus from the Commission, staff, carriers and consumers,² while risking developments that are out of sync with the remaining issues under review in the companion docket. It would be more appropriate to address all issues in a single forum so that the ongoing health and effectiveness of the Lifeline program and other public purpose programs can be addressed in a comprehensive manner, and the risk of unintended consequences from revisions to policy can be minimized.

B. The Overall Health of the Fund is at Issue in the PPP Proceeding

One of the reasons it is crucial to ensure that the prepaid wireless market, which is recognized in the petition as a large and growing portion of the overall wireless market,³ contributes fairly to the fund is to ensure the overall health of the fund in the face of increased demand and potential expansion of the LifeLine program to include wireless service.⁴ The impact of the various options under consideration in the PPP Proceeding on the fund is an important issue; there is substantial concern that moving the Lifeline program from a set payment amount to a set benefit amount (regardless of whether wireless Lifeline is adopted) will result in a large increase in the amount of money required from the fund. If Lifeline is expanded

requirement that collection of PPP surcharges be administered in a manner that is competitively neutral. It would also be bad policy to excuse a significant cluster of users from supporting public purpose programs. To the extent that another prepaid wireless carrier (TracFone) is currently taking the position that it is not required to pay into the fund, the Commission is appropriately taking steps to ensure that payment is provided. See I.09-12-016.

² Consumer groups and Commission staff, in particular, have limited resources to dedicate to multiple overlapping proceedings; work can be managed more effectively and efficiently by addressing related issues in a single proceeding.

³ See Petition at p. 2

⁴ The Petition notes this is under discussion in the PPP Proceeding and suggests that prepaid wireless would have a role in the program if it is expanded; the Petition further notes that the Commission and carriers would have to determine which prepaid services are exempt from paying into the fund. Petition at 2-3. In some ways, this puts the cart before the horse in presuming both the introduction of wireless Lifeline and the inclusion of a prepaid model. In other respects, it highlights the importance of considering all the inter-related policy issues in a single docket.

CERTIFICATE OF SERVICE

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of “Joint Response of The Utility Reform Network (TURN) And Disability Rights Advocates to the Verizon Wireless Petition for Rulemaking” on all known parties to P.09-12-018 and R.06-05-028.

Dated January 11, 2010, at Berkeley, California.

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Kaitlin Anderson

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