



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

FILED

Order Instituting Rulemaking To Update the
California Universal Telephone Service
(California LifeLine) Program.

R.20-02-008
(Filed March 4, 2020)

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**COMMENTS OF THE NATIONAL LIFELINE ASSOCIATION, BOOMERANG
WIRELESS, LLC (U4436C), AMERIMEX COMMUNICATIONS CORP. DBA
SAFETYNET WIRELESS (U4458C), AMERICAN BROADBAND &
TELECOMMUNICATIONS COMPANY (U4457C), GLOBAL CONNECTION INC.
OF AMERICA D/B/A STANDUP WIRELESS (U4423C), I-WIRELESS, LLC
(U4372C) AND TRUCONNECT COMMUNICATIONS, INC. (U4380C) ON
PROPOSED DECISION REGARDING RENEWALS PROCESS IMPROVEMENTS
AND COMPLIANCE WITH ASSEMBLY BILL 74**

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April 11, 2022

TABLE OF AUTHORITIES

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SUMMARY OF RECOMMENDATIONS TO PROPOSED DECISION

The Commission Should Adopt its Conclusion in the Proposed Decision to Eliminate the Use of PINs for All Renewals Completed Through a Database or for Participants That Have Personal Identification Information (PII) on File as of the Date the Renewals Suspension Ends, Which Is Inconsistent With the Third Party Administrator (TPA) Developing a Subscriber Set PIN Process for Renewals; and Explain in the Final Decision Who the Participants Are That Do Not Have PII on File 1-2

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The National Lifeline Association (NaLA) and its participating members in California (Boomerang Wireless, LLC, AmeriMex Communications Corp. dba SafetyNet Wireless, American Broadband & Telecommunications Company, Global Connection Inc. of America d/b/a StandUp Wireless and i-wireless, LLC) and TruConnect Communications, Inc., pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, respectfully submit to the California Public Utilities Commission (Commission) these comments on the Proposed Decision Regarding Renewals Process Improvements and Compliance With Assembly Bill 74 issued on March 21, 2022.¹ NaLA represents many wireless LifeLine service providers in California, as well as other parts of the LifeLine ecosystem including distributors like Moreable LLC dba Mobilized Retail Marketing that are critical to connecting low-income Californians with LifeLine services.

NaLA supports the Commission's conclusion in the Proposed Decision to eliminate the use of PINs for all renewals completed through a database or for participants that have personal

¹ Proposed Decision Regarding Renewals Process Improvements and Compliance With Assembly Bill 74, R.20-02-008 (issued Mar. 21, 2022) (Proposed Decision).

identification information (PII) on file as of “the date the renewals suspension ends.” That conclusion is consistent with the requirements of Assembly Bill (AB) 74. However, it is inconsistent with the Third Party Administrator (TPA) developing a subscriber set PIN process for renewals. Further, the Proposed Decision sets a deadline of December 31, 2023 to implement recertification without a Commission-issued PIN for participants without PII. The Commission should explain in the final decision who the participants are that do not have PII on file.

In the Proposed Decision, the Commission concludes that,

it is reasonable for the Commission’s staff to (a) **eliminate the use of a PIN for all renewals completed through database matching and for all participants with personal identification information on file as of the date the renewals suspension concludes....**²

NaLA supports this conclusion, which is consistent with the requirement in AB 74 that “[t]he lifeline program’s third-party administrator shall verify the lifeline subscriber’s identity using the personally identifiable information that the administrator has on file. The commission shall not require a lifeline subscriber to use a commission-issued personal identification number (PIN) for identity verification.”³ However, it is also NaLA’s understanding that the California LifeLine TPA is developing a process for California LifeLine subscribers to create four digit PINs (or after 30 days a system-generated PIN will be sent to the subscriber) to be used for renewals.⁴ Creation of a PIN-based process for renewals, whether the PINs are generated by the Commission, the TPA or the subscriber, is not consistent with AB 74⁵ or the language of the

² Proposed Decision, 12 (emphasis added). The renewals suspension concludes on June 30, 2022. *See* Administrative Law Judge’s Ruling Extending the Suspension of Certain Processes and Rules Through June 30, 2022, R.20-02-008 (Mar. 28, 2022).

³ *Id.*, 9 (citing Cal. Pub. Utils. Code § 878.6(a)(2)(B)).

⁴ *See* Email from Jim Graettinger, CA LifeLine Service Provider Liaison, “CA LifeLine – TPA_Service Providers Meeting – 02.24.2022” attachment (Feb. 24, 2022).

⁵ Regardless of who generates the PIN, AB 74 specifies the method to be used for identity verification for renewals – “The lifeline program’s third-party administrator shall verify the lifeline subscriber’s identity

Proposed Decision, which states that the Commission will “eliminate the use of a PIN for all renewals...for all participants with PII on file.”⁶ Therefore, the Commission should direct the TPA to cease development of PIN-based renewals processes or at least not use them for any LifeLine participants that have PII on file.

In addition, the Proposed Decision concludes that “it is reasonable for Commission staff to...(b) implement recertification without a Commission-issued PIN for participants without a database match or personal identification information on file by December 31, 2023.”⁷ NaLA assumes that all LifeLine participants should have PII on file with the TPA for enrollment. Therefore, the Commission should explain in the final decision who the participants are that do not have PII on file.

using the personally identifiable information that the administrator has on file.” Cal. Pub. Utils. Code § 878.6(a)(2)(B).

⁶ Proposed Decision, 12.

⁷ *Id.*

Respectfully submitted this 11th day of April, 2022.



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