

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



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

R. 20-02-008  
(Filed Feb. 27, 2020)

**VERIZON VALUE, INC. D/B/A TRACFONE (U-4231-C)  
COMMENT ON ADMINISTRATIVE LAW JUDGE'S RULING ADMITTING STAFF  
PROPOSAL: MODIFICATION TO DECISION 24-05-003**

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## INTRODUCTION

Verizon Value, Inc. d/b/a TracFone (“Verizon”)<sup>1</sup> respectfully submits these comments concerning the June 13, 2025 Administrative Law Judge’s Ruling (“Ruling”) Admitting Staff Proposal (“Staff Proposal”): Modification Decision 24-05-003 (Decision or D.24-05-003). As the LifeLine provider supporting the Foster Youth Program (“FY Program”), Verizon generally supports the California Public Utility Commission’s (“CPUC” or “Commission”) Staff Proposal to incorporate more efficient administrative processes into the FY Program. Growth and efficiency will amplify the FY Program’s reach and increase its public benefits. Verizon appreciates the ongoing collaboration with the FY Program stakeholders and looks forward to continued success serving this population’s communication needs.

Verizon offers specific comments on expanding eligibility for participants to remain in the program until age 21 and facilitating their transition to the general California LifeLine program, and the proposed 90-day non-usage rule. While Verizon does not offer specific comments on the other changes in the Staff Proposal, Verizon generally supports modifications making the FY Program more efficient to manage and effective in providing communications services to California foster youth.

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<sup>1</sup> Verizon Value, Inc. d/b/a TracFone is owned by Verizon Communications and is part of Verizon’s portfolio of wireless offerings. When Verizon Value, Inc. commented on the Youth Law Center Petition in March, it did so under its former name, TracFone Wireless, Inc. As of May 16, 2025, TracFone Wireless formally changed its name to Verizon Value, Inc d/b/a TracFone via Advice Letter 127.

## DISCUSSION

### **I. Verizon supports allowing foster youth to remain in the FY Program until age 21 and offers to inform these transitioning adults about SafeLink’s no-cost LifeLine plans.**

Verizon supports the Staff Proposal’s expanded eligibility to any current and former foster youth between the ages of 13 and 20 who were in foster care at any time on or after their 13<sup>th</sup> birthday.<sup>2</sup> The proposed modifications to Conclusions of Law 1(a), 1(d), 6, and 7, if implemented, will allow both current and former foster youth to receive the crucial communications services the FY Program offers participants. As the Youth Law Center notes in their Petition for Modification (“YLC Petition”), “the experiences of foster youth and non-minor dependents who have aged out or otherwise left foster care show that they need continued support in their transition out of foster care.”<sup>3</sup> Expanding the eligibility requirements in Conclusion of Law 1(a) and removing the restrictive provisions of Conclusions of Law 1(d) and 6 ensures this support remains in place.

Verizon further supports these changes because they will make the FY Program more efficient. Both the YLC and TURN commented that current rules require youth who exit and then re-enter foster care to reapply to the FY Program.<sup>4</sup> This adds unnecessary time and expense for the foster youth and may deter participation by burdening the enrollment process. As modified, foster youth need only apply once and can rely on their initial determination of

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<sup>2</sup> Staff Proposal: Modification to Decision 24-05-003, California LifeLine Foster Youth Program, R.20-02-008, Communications Division (June 13, 2025) (Staff Proposal) at 2–3.

<sup>3</sup> Petition of the Youth Law Center to Modify Decision 24-05-003, R.20-02-008 (Feb. 24, 2025) (YLC Petition) at 9. *See also* Response of The Utility Reform Network to the Petition of the Youth Law Center to Modify Decision 24-05-003, R.20-02-008 (Feb. 27, 2025) (TURN Response) at 2–3 (“Uninterrupted access to phone service through the Foster Youth Pilot can be a throughline that can keep them connected to help and support through these extremely challenging periods. Maintaining eligibility between spells in foster care for youth who will re-enter care is also less administratively burdensome for all parties involved”).

<sup>4</sup> YLC Petition at 9; TURN Response at 3.

eligibility for FY Program service until their 21<sup>st</sup> birthday. This insulates the eligible youth and all stakeholders involved from the loss or intermittency of service upon temporarily or permanently leaving foster care.

Verizon also supports the Staff Proposal's directive to conduct outreach to youth in the FY Program after their 18<sup>th</sup> birthday to help transition eligible adults to a general LifeLine program.<sup>5</sup> While ensuring access to the FY Program until each foster youth turns 21 is crucial, those 18+ may have communications needs different than those provided by the FY Program. California LifeLine has many plans catering to the various needs of adult participants transitioning from foster care, including the option to bring their own device.<sup>6</sup> Starting this outreach at 18 ensures FY Program participants are aware of their options upon potentially becoming eligible for LifeLine. This early outreach will allow those FY Program participants that are potentially eligible for LifeLine additional time to explore their LifeLine options without fear of losing their current service.

As part of this outreach, Verizon offers to begin sharing information about the services offered by its SafeLink and other LifeLine brands to FY Program participants after they turn 18. To accommodate such outreach, Verizon recommends edits to the Staff Proposal's Conclusion of Law 7 that permit the FY Program provider to inform participants over the age of 18 regarding their potential eligibility for LifeLine services offered by the FY Program provider.<sup>7</sup> Most importantly, this revision promotes continuity of service for participants. As the carrier administering the FY Program, Verizon is well-situated to facilitate an informed and streamlined transition to the LifeLine program for eligible participants.

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<sup>5</sup> Staff Proposal at 3.

<sup>6</sup> *Id.*

<sup>7</sup> Exhibit A.

**II. Verizon supports the proposed changes to Conclusion of Law 13 to set a temporary suspension period of 90 days and recommends the non-usage rule should take effect no earlier than January 1, 2026.**

Verizon supports the proposed changes to Conclusion of Law 13 reducing the temporary suspension period to 90 days (from the 120 days set by the current Decision).<sup>8</sup> As Verizon noted in its comments on the YLC Petition, Verizon’s internal systems do not support the 120-day requirement and their reconfiguration is not viable.<sup>9</sup> Verizon appreciates the Commission’s alignment of FY Program rules with standard industry practices “to support operational and administrative efficiency.”<sup>10</sup>

Verizon recommends the Commission set an effective date no sooner than January 1, 2026 for Conclusion of Law 13’s introduction of a 90-day non-usage de-enrollment rule.<sup>11</sup> Verizon notes that the Decision specifically considered and opted not to implement a non-usage rule like the one currently applicable to LifeLine. The Commission implementing a non-usage rule after the first year of the pilot FY Program experience will substantially increase the administrative effort by Verizon and the TPA for enrollment and detailed monitoring of any usage and bouts of non-usage. To be clear, Verizon does not oppose the rule change due to its significant impact on its operation of the FY Program. However, the extent of the change to the current FY Program operations of Verizon compels Verizon to respectfully request until January 1, 2026 to develop and implement the systems required by the new rule.

The non-usage rule taking effect at the start of 2026 is consistent with the Staff Proposal’s objective to “[maintain] appropriate checks to support program integrity.”<sup>12</sup> The systems Verizon

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<sup>8</sup> Staff Proposal at 4–5.

<sup>9</sup> TracFone Wireless, Inc. (U-4231-C) Response to Petition of the Youth Law Center to modify Decision 24-05-003, R.20-02-008 (Feb. 27, 2025) (TracFone Comment) at 4–5.

<sup>10</sup> Staff Proposal at 5–6.

<sup>11</sup> Staff Proposal at 5–6.

<sup>12</sup> Staff Proposal at 2.

and the TPA will employ to implement a non-usage rule require adequate time to effectively test and implement in the FY Program context. A January 1, 2026 or later implementation date ensures Verizon, and likely the TPA as well, will have the necessary timeline to implement a 90-day non-usage rule.

**III. Verizon takes no position on removing ward of the court or county letter requirements, allowing County child welfare officers to apply for the FY Program on behalf of foster youth, or removing of the Family Urgent Response System text requirement.**

Verizon takes no position on the Staff Proposal's changes to Conclusion of Law 1(b) allowing youth to enroll in the FY Program without providing a ward of the court or county dependency letter.<sup>13</sup> Verizon also takes no position on the Staff Proposal's changes to Conclusion of Law 4(f) and (g) allowing County child welfare agencies to apply for the FY Program on behalf of youth in their care without the youth's signature.<sup>14</sup> Finally, Verizon takes no position on the proposed changes to Conclusions of Law 11(a) and (e) removing the requirement for the TPA to text the Family Urgent Response System (FURS) number when youth activate their devices.<sup>15</sup> Verizon is already coordinating with the TPA to pre-load devices with the FURS number prior to shipment and would be able to comply with this change if adopted.

While Verizon takes no position on these modifications, Verizon broadly supports changes that will make the FY Program more efficient and able to effectively serve California's foster youth. Verizon reserves its right to comment on these topics in the future if new information arises.

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<sup>13</sup> *Id.* at 3–4.

<sup>14</sup> *Id.* at 4–5.

<sup>15</sup> *Id.* at 7.

## CONCLUSION

Verizon supports the Staff Proposal's recommended changes to D.24-05-003 increasing the pool of eligible youth and changing the de-enrollment window to 90 days. These changes will increase access to and support the efficiency of the FY Program. Verizon further recommends allowing it to help facilitate the informed transfer of former FY Program participants onto the general LifeLine program. In addition, Verizon respectfully requests that the non-usage rule take effect January 1, 2026 or later to ensure adequate implementation time for all required changes to the internal systems of Verizon and the TPA. Because these changes are likely to increase access to the FY Program, and the California LifeLine program, Verizon generally supports them consistent with its other comments.

Respectfully submitted June 27, 2025.

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## **Exhibit A – Proposed changes**

Staff's proposed changes are in Red

Verizon's proposed changes are in Green

**COL 7.** ~~If the county child welfare agency informs the FY Program Administrator that a non-minor is no longer in foster care~~ Once a youth ~~or~~ has turned 21 years old, then the FY Program Administrator shall and the wireless provider(s) for the FY Program may send text messages to inform the foster youth (a) that program services will end in six months, and (b) how to apply for the general California LifeLine program.