BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking Proceeding to Consider Changes to the Commission's Carrier of Last Resort Rules.	R.24-06-012

COMMENTS OF VERIZON ON ALJ RULING REGARDING TOPICS DISCUSSED AT AUGUST 22, 2025 WORKSHOP

Pursuant to the Administrative Law Judge's Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop ("Ruling"), Verizon Communications, Inc. ("Verizon") submits these comments to the Ruling's questions.[1]

We appreciate the opportunity to respond to the questions posed in the Ruling. While Verizon is not a Carrier of Last Resort ("COLR") and does not currently offer residential wireline services in California, Verizon entities are regulated as incumbent local exchange carriers in other states. Verizon responds specifically to the ordered questions as both a wireline and wireless carrier.

To summarize, Verizon offers services that are either already compatible with services offered through existing California programs or designed to support next generation versions of those programs and services. We look forward to partnering with the State of California in developing solutions that ensure accessibility and interoperability in the future.

[1] On October 20, 2025, the ALJ granted an extension of all deadlines in the Ruling so that opening comments are due November 21, and reply comments are due December 4.

Accessibility

1. To what extent is California Relay Service, or any other element of basic service, necessary to ensure accessibility of essential communications services, compatible with IP-enabled advanced networks, Voice over Internet Protocol (VoIP), or wireless products?

The California Relay Service offers a critical tool to allow people who are deaf, hard of hearing, or have speech disabilities to communicate over voice services. The statute governing the rules for the California Relay Service does not specify the type of technology that must be used and the Commission can design the California Relay Service to provide access to different technologies, including VoIP and wireless service. This will be important as consumers increasingly rely on more advanced technologies and services than legacy wireline.

The current definition of "Basic Service" requires a provider to offer free access to California Relay Service.[2] That section requires the Commission to design a program that will offer a free telecommunications device (along with a single party line) capable of serving the needs of deaf or hard of hearing individuals at no additional charge to the basic exchange rate, to eligible subscribers.

The Commission should explore additional modern options for providing this critical offering, and successful models exist at the federal level. In addition to the several traditional relay services available to users through California Relay Service, a customer with mobile or fixed broadband can also use one of the multiple types of Internet-based relay services, supported by the federal Telephone Relay Service program. These services are "over-the-top" (OTT) versions of relay services that operate using an Internet connection and give users a variety of different relay options and are often more flexible, effective, and easier to use for all-

[2] Pub. Util. Code Section 288.

distance domestic calling. These Internet-based services include video relay service, IP relay, and IP captioned telephone.[3] Separately, any person with a wireless phone can send and receive person-to-person real-time text (RTT) calls that have the ability to combine voice and character-by-character text in a way that replaces the need for many relay calls. Further, the RTT capability on mobile phones is backward compatible with TTY and eliminates the need to attach separate TTY equipment to mobile phones to make RTT or TTY calls.[4] Finally, we are encouraged that, in addition to this review, the Federal Communications Commission has just initiated a broad proceeding to review the future of relay services, including questions about traditional TDM-based relay services and an eventual transition to the more modern and popular internet-based services.[5]

2. To what extent are the equipment and services, such as Teletypewriters/TTY services, and other equipment and services provided through California Connect, compatible with advanced, IP-enabled networks and Voice over Internet Protocol (VoIP) products? To what extent are these compatible with wireless networks? For responding carriers, please specify which equipment and services are not compatible with your networks.

Equipment and services provided through California Connect, including Teletypewriters/TTY services, are generally compatible with advanced IP-enabled networks and Voice over Internet Protocol (VoIP) services. As a general matter, Internet-based relay services can be used on mobile or fixed broadband networks and are supported by the federal Telecommunications Relay Service (TRS) program. Verizon's fiber-based voice services,

[3] *See* https://www.fcc.gov/trs
[4] *See* https://www.fcc.gov/real-time-text
[5] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Notice of Proposed Rulemaking, FCC 25-79 (rel. Nov. 21, 2025) https://docs.fcc.gov/public/attachments/FCC-25-79A1.pdf

including both traditional switched and VoIP-based services that operate over fiber, work with legacy TTY equipment.[6]

For other advanced IP-enabled networks such as wireless networks, mobile wireless providers introduced real time text (RTT) across their phone lineups over 5 years ago. RTT is an interoperable successor to traditional TRS that works on mobile phones, allowing real time (character-by-character) text with simultaneous voice transmission. This capability works between other RTT users and is backwards-compatible with traditional TRS, meaning customers with mobile phones can contact TRS (and 911) using their RTT-enabled mobile phones. And unlike traditional TRS, users no longer need to attach a separate TTY device to their mobile phones because a software-based interface for both keyboard input and message display are integrated into modern phones. Customers often can still connect to traditional TTY hardware, too, or can pair with other peripherals, such as keyboards, to provide more accessible input and/or output interfaces. Thus, a mobile wireless caller can make direct person-to-person RTT calls, or can use California Relay (or federal relay services) using their mobile phone.

The Commission's Deaf and Disabled Telecommunications Program ("DDTP") is already providing certain technologies or equipment for wireless phones, such as cell phone amplifiers, as well as other IP-compatible equipment like tablets for individuals with speech impairments. The Commission staff is currently recommending modernizing the DDTP so that it will offer other IP-based and wireless-based devices, such as tablets, telephones, smartphones,

[6] See Verizon FCC Letter, https://www.fcc.gov/ecfs/document/10192514908619/1

and WiFi devices. Modernization of the DDTP will ensure that DDTP-eligible subscribers are able to take advantage of current technologies that offer additional features for their needs.

3. What customer protections or other rules are necessary or appropriate to ensure the continuity of service for customers reliant on California Relay Service, TTY services, or other equipment and services provided by California Connect, if COLRs are granted relief from the obligation to provide basic service, or choose to no longer offer it over plain old telephone service (POTS)?

The current framework will adequately ensure continuity of service for customers who rely on California Relay Service, TTY services, or other equipment and services provided by California Connect independent of providers' carrier of last resort obligations. California has been a leader in ensuring that customers who are deaf, hard of hearing, or have speech disabilities have accessible service, regardless of the technology they use for voice service.

Current Basic Service elements include a requirement to offer free access to California Relay Service, and such telecommunications access would be subject to the Commission's consumer protection requirements, like other telecommunications services. The federal government has also acted with precision and foresight in this area in building solutions that serve the current and next generations of technologies. As noted, customers with wireless service have access to RTT and internet-based services that will have equivalent or better relay capabilities (such as video relay services) to traditional relay services. No additional rules are necessary.

4. Basic service requires free access to California Relay Service. Are there any cases in which a provider has charged for access to relay service in the absence of an obligation to provide it for free? Should the Commission consider placing the requirement to offer free access to California Relay Service on other carriers if the COLR withdraws? Is access to California Relay Service possible through wireless and VoIP services?

Verizon entities do not currently provide residential telephone service in California and Verizon is not aware of any instances in which providers have charged for access to relay service absent an obligation to provide it for free. With respect to wireless service, providers generally route 711-dialed calls to the *toll-free* number associated with the state TRS provider, which is currently Hamilton Relay in California.

Ordering Carriers to Provide Information

Carriers are ordered to respond to the specific questions listed below.

3. AT&T (AT&T California and AT&T Mobility), Frontier, Consolidated, Comcast, Charter, Cox, Verizon, and T-Mobile are ordered to identify which of your products (excluding POTS), if any, are compatible with California Relay Service. Identify the conditions under which these products are able to offer service (For example, does a specific product require back-up power? Is there a specific type of equipment necessary for a product to function? Are there other conditions necessary for the product to function?). Given its application to acquire Frontier California,[7] Verizon shall ensure its response is inclusive of both wireless and any wireline solutions that may be offered in California.

Verizon responds to the ordered questions with respect to the following services (excluding POTS over copper facilities) that it either currently offers in California or expects to offer in California in the future.

[7] Application 24-10-006, In the Matter of the Joint Application of Verizon Communications Inc., Frontier Communications Parent, Inc., Frontier California Inc., Citizens Telecommunications Company of California Inc., Frontier Communications of the Southwest Inc., Frontier Communications Online and Long Distance Inc., and Frontier Communications of America, Inc. for Approval of the Transfer of Control of Frontier California Inc. (U1002C), Citizens Telecommunications Company of California (U1024C), Frontier Communications of the Southwest Inc. (U1026C), Frontier Communications Online and Long Distance Inc. (U7167C), and Frontier Communications of America, Inc. (U5429C), to Verizon Communications Inc. Pursuant to California Public Utilities Code Section 854.

- **Verizon's Mobile Wireless:** This is Verizon's traditional wireless voice service, offered in connection with our standard mobile wireless service.
- **Verizon Wireless Home Phone:** This service connects an existing landline phone to the Verizon wireless network through a separate device to provide voice service. The base unit receives a wireless signal and has a port to connect to standard landline telephone equipment.
- **Verizon Voice Connect:** This service also connects an existing landline phone to the Verizon wireless network through a separate, professionally installed device to provide voice service.
- **Verizon Fios Digital Voice:** This service uses the fiber-optic network but does not transmit analog voice signals.
- **Verizon Plain Old Telephone Service Over Fiber:** This service replaces voice service over copper facilities with a fiber optic-based system. Analog voice signals are transmitted over Verizon's fiber network.

Mobile Wireless

Verizon's mobile wireless service is compatible with California Relay Service. Users can rely on "over the top" versions of relay services that operate based on an Internet connection for flexible and effective use. These services include video relay service, IP relay, and IP-captioned telephone. Separately, any person with a relatively recent wireless smartphone (and some basic phones) can send and receive person-to-person RTT calls that have the ability to combine voice and character-by-character text in a way that replaces the need for many relay calls. Users of

RTT do not need to rely on a separate TTY device because a software-based interface for both keyboard input and message display are integrated. Customers can still connect to traditional TTY hardware, too, or pair with other peripherals, such as keyboards, to provide more accessible input and/or output interfaces. Devices offering this service must be charged to operate but the software-based RTT capabilities on mobile phones do not require any external power source.

Voice Connect

Voice Connect supports Telecommunications Relay Service as it is defined in the FCC (CFR Rule: 47 CFR § 64 Subpart F). With respect to the California Relay Service, Voice Connect is compatible through an attachment to separate TTY equipment. The service includes a backup battery for power outages, ensuring E911 and medical devices can still function.

Verizon Wireless Home Phone

Wireless Home Phone supports Telecommunications Relay Service as it is defined by the FCC.[8] With respect to the California Relay Service, Wireless Home Phone is compatible through an attachment to separate TTY equipment. The service includes a backup battery for power outages, ensuring E911 and medical devices can still function.

Verizon Fios Digital Voice/Verizon Plain Old Telephone Service Over Fiber

Verizon has been offering voice services over fiber since it launched Fios in 2005 in its ILEC states.[9] Verizon's fiber network was designed to carry TTY and to do so seamlessly and transparently for customers who had previously been served over copper facilities. Fiber-based voice services are carried over separate bandwidth using managed dedicated circuits in order to

[8] CFR Rule: 47 CFR § 64 Subpart F
[9] Verizon does not currently offer Fios in California.

provide quality of service assurance and avoid resource constraints. Verizon uses the industry standard uncompressed G.711 codec for transmitting TTY calls over both types of fiber-based voice services.

With respect to back up power generally, fiber-based voice services require power at the customer's terminal. Verizon has battery backup units that it will install to provide up to 24 hours of voice calling. That said, most user's home phones and any TTY machines also require independent AC power.

4. AT&T (AT&T California and AT&T Mobility), Frontier, Consolidated, Comcast, Charter, Cox, Verizon, and T-Mobile are ordered to identify which products (excluding POTS) are compatible with Teletypewriters/TTY services and other equipment and services provided through California Connect. Specify the conditions under which your carrier is able to offer such services. Specify which equipment and services are not compatible with your networks. Verizon shall ensure its response is inclusive of both wireless and any wireline solutions that may be offered in California.

TTY technology predates IP networks and was designed for analog telephone lines. TTY transmits data using audible tones (Baudot) that are often distorted or corrupted by the data compression algorithms (codecs) used in modern VoIP networks. This can result in performance and reliability issues. For that reason, Verizon recommends that customers transition from TTY to RTT, which is natively designed for IP networks, is supported on most modern smartphones, and provides a far more reliable and feature-rich user experience. RTT is backward compatible, allowing RTT users to communicate with TTY users through the Telecommunications Relay Service by dialing 711. Compatibility of various Verizon services with TTY is discussed in further detail below.

Mobile Wireless

Verizon's mobile wireless service is compatible with Teletypewriters/TTY Services. Users of Real Time Text (which is interoperable with TTY devices)[10] do not need to rely on a separate TTY device because a software-based interface for both keyboard input and message display are integrated. Customers can still connect to traditional TTY hardware, too, or pair with other peripherals, such as keyboards, to provide more accessible input and/or output interfaces.

Other equipment provided through the California Connect program that relies on a standard internet connection is generally compatible with this service. This includes:

- Amplified phones or captioned telephones that connect via Wi-Fi or an Ethernet port.
- Signaling devices and visual alerters that are IP-based.
- Speech-generating devices that use the internet for communication apps.

Wireless Home Phone/Voice Connect

Wireless Home Phone and Voice Connect are both compatible with Teletypewriters/TTY Services. Other equipment provided through the California Connect program that relies on a standard internet connection are generally compatible with these services.

Verizon Fios Digital Voice/Verizon Plain Old Telephone Service Over Fiber

Verizon's voice over fiber offerings are compatible with Teletypewriters/TTY Services and some other equipment and services provided through California Connect.

5. AT&T (AT&T California and AT&T Mobility), Frontier, Consolidated, Comcast, Charter, Cox, Verizon, and T-Mobile are ordered to identify which products (excluding POTS) supports elevator emergency systems,[11] highway call boxes, alarm

[10] *See* 47 C.F.R. 67.2(b).
[11] It is our understanding that a dedicated cell or smart phone permanently mounted in an elevator car does not meet the requirement that an elevator has an emergency signaling device.

systems, or any other ancillary services. For responding providers, please indicate whether the infrastructure serving any of your voice products are not compatible with elevator emergency systems,[12] highway call boxes, electronic highway signage, alarm systems, or any other ancillary services. Verizon shall ensure its response is inclusive of both wireless and any wireline solutions that may be offered in California.

Mobile Wireless

Verizon's wireless service should support many monitored home security systems, modern fax machines, and medical alert services (e.g. Life Alert). The mobile wireless service does not support ancillary services that depend on the physical and electrical characteristics of a traditional copper telephone line. These systems require a direct connection to a Public Switched Telephone Network (PSTN) line, which provides line power (operable during a local power outage) and specific signaling (e.g., DTMF tones, modem signals) that a broadband internet service does not replicate.

Services that are not supported include:

- Elevator Emergency Systems
- Legacy Highway Call Boxes
- Certain Legacy Monitored Alarm & Security Systems
- Certain Point-of-Sale (POS) systems or credit card readers
- Certain Fax Machines including those that depend on the physical or electrical characteristics of a traditional copper phone line

[12] It is our understanding that a dedicated cell or smart phone permanently mounted in an elevator car does not meet the requirement that an elevator has an emergency signaling device.

For legacy elevator and highway call boxes and other ancillary services that depend on the physical and electrical characteristics of a traditional copper line, Verizon's mobile wireless service is not currently compatible. Verizon's mobile wireless service includes a high-speed broadband service that allows users to run the apps now commonly in use to perform POS functions, to exchange documents (instead of using fax machines), and to operate and monitor home alarm and security systems. Accordingly, there are alternative products and technologies that can meet the needs above, including different kinds of signaling or wireless alarms.

Voice Connect/Wireless Home Phone

These services should support many monitored home security systems, fax machines, and medical alert services (e.g. Life Alert). These services do not support ancillary services that depend on the physical and electrical characteristics of a traditional copper telephone line. Services that are not supported include:

- Elevator Emergency Systems
- Legacy Highway Call Boxes
- Certain Legacy Monitored Alarm & Security Systems
- Certain Point-of-Sale (POS) systems or credit card readers
- Certain Legacy Fax Machines

However, as noted above, there may be alternative products and technologies that can meet the needs listed above, including different kinds of signaling or wireless alarms.

Verizon Plain Old Telephone Service Over Fiber

This service should support many monitored home security systems, fax machines, and medical alert services (e.g. Life Alert). This service does not support ancillary services that depend on the physical and electrical characteristics of a traditional copper telephone line. However, most legacy services that do not depend on those characteristics should be supported.

Verizon Fios Digital Voice

This service should support modern monitored home security systems, fax machines, and medical alert services (e.g. Life Alert). This service does not support ancillary services that depend on the physical and electrical characteristics of a traditional copper telephone line. These systems require a direct connection to a Public Switched Telephone Network (PSTN) line, which provides line power (operable during a local power outage) and specific signaling (e.g., DTMF tones, modem signals) that a broadband internet service does not replicate.

Services that are not supported include:

- Elevator Emergency Systems
- Highway Call Boxes
- Certain Monitored Alarm & Security Systems
- Certain Point-of-Sale (POS) systems or credit card readers
- Certain Legacy Fax Machines

Conclusion

Verizon appreciates this opportunity to respond to these questions and looks forward to working with the Commission in this proceeding to ensure accessibility and interoperability.

Respectfully submitted this 21st day of November 2025,

/s/ Jane Whang

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