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Order Instituting Rulemaking to Update the California LifeLine Program.	Rulemaking 25-11-005 (Filed November 20, 2025)

OPENING COMMENTS OF THE UTILITY REFORM NETWORK ON THE STAFF PROPOSAL ON LIFELINE SPECIFIC SUPPORT AMOUNT AND MINIMUM SERVICE STANDARDS

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I. INTRODUCTION

Pursuant to the November 26, 2025, *Order Instituting Rulemaking to Update the California LifeLine Program* and revised schedule pursuant to the December 8, 2025, *Email Ruling Extending Deadlines to File Opening and Reply Comments on the Staff Proposal*, The Utility Reform Network (TURN) timely files these opening comments on the *Staff Proposal on LifeLine Specific Support Amount and Minimum Service Standards* (Staff Proposal). TURN generally supports the proposed changes in the Staff Proposal and in these comments makes recommendations to balance the need to responsibly steward state LifeLine funds with the need to create LifeLine service offerings that are affordable to subscribers and that meet their essential communications needs.

II. GENERAL SPECIFIC SUPPORT AMOUNT ISSUES

A. The Commission's Issuance of a New SSA Staff Proposal is Timely and Addresses the Evolving Affordability and Telecommunications Marketplace Landscapes.

TURN applauds the Commission's forward-looking approaches to developing a new Specific Support Amount (SSA) for both wireless and wireline service. In 2024, the Commission froze the SSA for both wireless and wireline providers at $19.00 per month until December 31, 2026, or until the Commission establishes a new methodology for calculating the SSA, whichever occurs first.[1] At the time, TURN supported the Commission's general proposal to update the methodology used to calculate the SSA so that it more closely aligned with provider service offerings.[2] Now, the Commission seeks comment on a new proposed methodology for

[1] D.24-12-006, issued in R.20-02-008 on Dec. 12, 2024, at p. 1.
[2] D.24-12-006 at p. 3.

calculating the SSA.[3] There is a year left before the SSA freeze expires, and TURN appreciates the opportunity for record development on this issue.

B. TURN Supports Applying the Commission's Affordability Analysis to Subscriber Co-Payments.

Similarly, TURN appreciates the Commission's use of the Affordability Ratio metric in assessing wireless co-payments for the California LifeLine Program.[4] TURN has supported the application of affordability metrics to LifeLine in the past, urging the Commission to utilize tools like the Affordability Ratio to address subscriber co-payments, which in some cases have ballooned to prices comparable to non-subsidized service offerings.[5] In fact, the Commission's own data shows that a majority of Lifeline subscribers are enrolled in plans with no co-payment at all.[6]

The Staff Proposal applies the Affordability Ratio metric to potential wireless service plan co-payments ranging from $5 to $25 in various Public Use Microdata Areas in Los Angeles County and finds that in half those presented in the Staff Proposal, even a $5 co-payment would be unaffordable for some low-income households, as it would utilize all of a household's non-discretionary funds.[7] However, as the Staff Proposal admits, the affordability ratio may *underestimate* the affordability of copayment rates, as it does not include expenses such as taxes, transportation, healthcare, or childcare.[8]

When available, the Commission should endeavor to incorporate as much affordability

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[3] *See generally* California Public Utilities Commission, Staff Proposal on Lifeline Specific Support Amount and Minimum Service Standards (Staff Proposal), issued Nov. 3, 2025, available at https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M588/K329/588329427.pdf.
[4] Staff Proposal at pp. 11-14
[5] Reply Comments of TURN and The Greenlining Institute on the Administrative Law Judge Ruling Requesting Comments on the Program Assessment filed in R.20-02-008 on July 1, 2022, at p. 7.
[6] Staff Proposal at p. 13, table 7.
[7] Staff Proposal at pp. 12-13, table 6.
[8] Staff Proposal at p. 12.

analysis as possible into assessments of subscriber co-payments to give the clearest picture of communications affordability. As such, TURN supports the continued and expanded use of the affordability metrics to show how the proposed and existing LifeLine SSAs may impact communications affordability across California. Specifically, TURN recommends applying the Affordability Ratio to wireline co-payments as well as wireless co-payments.

C. The Commission Should Ensure the New SSA Methodology Complies with Public Utilities Code Section 873.

The Staff Proposal highlights that switching from the COLR methodology to the Set Price SSA eliminates the need for annual SSA updates associated with the COLR methodology.[9] While the Staff Proposal states that it will conduct an annual market analysis to assess affordability and make necessary SSA and MSS adjustments,[10] this market analysis alone may be insufficient to comply with the Public Utilities Code. Section 873 states that the Commission shall set the rates and charges for LifeLine services annually.[11] The Commission should clarify whether its annual marketplace analysis will satisfy this requirement, or whether it will continue to annually issue administrative letters about the upcoming year's SSA. This clarification would inform both consumers and providers about how to determine whether the SSA will change. Absent an annual administrative letter, the Commission should determine another effective way to inform stakeholders when the SSA has changed.

III. WIRELESS ISSUES

A. Wireless SSA

1. TURN Supports Updating the Wireless SSA Methodology.

The Staff Proposal offers a separate methodology for setting the wireless SSA: the Set

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[9] Staff Proposal at p. 14.
[10] Staff Proposal at pp. 14-15.
[11] Cal. Pub. Util. Code § 873(a)(2).

Price SSA, which would be a fixed price derived from wireless retail market offerings and LifeLine subsidies in other states and reviewed annually by Staff.[12] TURN supports this much-needed update, as it would no longer tie the *wireless* SSA to rates for *wireline* basic service (or, effectively, a single wireline provider that consistently increases its rates).[13] There is no shortage of data available on wireless market offerings, consumers' usage of wireless service, and examples from other state Lifeline programs to inform the Commission's calculation of a wireless-specific SSA.

2. The Staff Proposal Correctly Uses Wireless Retail Rates as a Baseline for the SSA.

As discussed above, the Staff Proposal would use wireless retail market offerings as a data source when calculating the SSA. TURN supports this approach and continues to advocate that retail offerings should be a *ceiling* on the SSA,[14] as the California LifeLine program is a guaranteed payer. Compared to the retail averages presented in the Staff Proposal, the five proposed wireless LifeLine service tiers each "beat the market,"[15] and TURN appreciates the increased data allowances. However, TURN generally cautions that the wireless minimum service standards (MSS) should not be so high that, combined with the SSA, they preclude the participation of all but facilities-based wireless providers and their affiliates, which can rely on their economies of scale. TURN may offer further comments on the proposed wireless SSA in reply comments.

B. Wireless Minimum Service Standards

1. Comparing Offerings of California LifeLine Providers to the Staff Report's Analysis of Retail Wireless Plans Indicates Continuing

[12] Staff Proposal at pp. 14-15.
[13] *See* Staff Proposal at pp. 2-3.
[14] *See, e.g.,* Opening Comments of TURN on the ALJ's Ruling on Subsidy and Service Standards Staff Proposal (TURN 2024 SSA & MSS Opening Comments), filed in R.20-02-008 on Jan. 24, 2024, at p. 7.
[15] *Compare* Staff Proposal at pp. 9-10 *with id.* at p. 16.

Difference in Wireless Plan Offerings Based on Whether a Provider Participates in California LifeLine.

The Staff Proposal presents analysis of various wireless service providers' service plans, grouped by data allowances.[16] This analysis includes some providers that participate in LifeLine (e.g., SafetyNet Wireless, TracFone) and some that do not (e.g., AT&T Wireless, Trello). TURN supports the inclusion of the retail offerings of providers that do not participate in LifeLine in the Staff Proposal's analysis. In early 2024, TURN conducted an analysis of LifeLine providers' and non-LifeLine participating providers' retail and LifeLine plans that included the offerings of facilities-based providers, affiliates of facilities-based providers, and mobile virtual network operators (MVNOs).[17] In that analysis, TURN found differences in the amount of data and price of service a wireless provider offered did not depend on whether it was facilities-based but instead whether it participated in California LifeLine.[18]

For these comments, TURN reviewed the service offerings of California LifeLine wireless providers not included in the Staff Proposal's analysis to determine if this trend persists. TURN added the retail and California LifeLine service offerings of California LifeLine providers to the wireless plans already included in the analysis in the Staff Proposal. The offerings, grouped by amount of wireless data included per month, are depicted in Figure 1, below.

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[16] Staff Proposal at pp. 9-10.
[17] Opening Comments of TURN on the Administrative Law Judge's Ruling on Subsidy and Service Standard Staff Proposal (TURN 2024 SSA Opening Comments), filed in R.20-02-008 on Jan. 24, 2024, at pp. 9-12.
[18] TURN 2024 SSA Opening Comments at p. 12.

Figure 1. Retail and California LifeLine Wireless Service Offerings[19]

Provider	Advertised Price	Data allowance (in GB)
<5 GB of data		
Tello	$8.00	0
Tello	$9.00	1
Gen Mobile (R, P)	$10.00	1
Tello	$10.00	2
Red Pocket (R)	$10.00	3
AirVoice (R, P)	$12.00	1
TracFone (R, P)	$15.00	1
TruConnect (R, P)	$15.00	1
AirVoice (R, P)	$18.00	3
TracFone (R, P)	$20.00	4
Safety Net (R)	$25.00	1
Safety Net (R)	$35.00	3
Safety Net (LL)	$39.25	4.5
Safety Net (R)	$43.00	4.5
TruConnect (LL)	$45.00	4.5
Boomerang (LL)	$59.10	4.5
Average Price	$20.95	

5 GB to 6 GB of data		
Tello	$14.00	5
Mint	$15.00	5
TruConnect (R, P)	$20.00	5
Dish	$20.00	5
Gen Mobile (R, P)	$20.00	5
AirVoice (R, P)	$24.00	6
Consumer Cellular	$25.00	5
TracFone (LL)	$25.00	6

[19] Retail plan information was obtained from provider advice letters and websites (accessed January 2, 2026) and is exclusive of promotional pricing or add-on services. Retail plan pricing is based on a single line of service. Pricing for prepaid plans is based on one month of service, except for Mint Mobile, which is based on three months of service (i.e., the shortest duration of service Mint Mobile offers).

California LifeLine plan information was obtained from provider advice letters. California LifeLine service offerings are based on prices before the application of subsidies and any provider discounts.

This analysis does not include any plan marketed as "unlimited."

Excess Telecom (LL)	$27.15	6
Dish	$28.25	6
AT&T Wireless	$30.00	5
Cricket Wireless	$30.00	5
Air Voice (LL)	$30.00	6
Sequoia Wireless (LL)	$30.00	6
Total Wireless (LL)	$30.00	6
American Broadband and Telecommunications (LL)	$34.95	6
Safety Net (LL)	$49.25	6
Safety Net (R)	$50.00	6
Infiniti Moblile (LL)	$50.00	6
TruConnect (LL)	$65.00	6
Boomerang (LL)	$69.10	6
Average Price	**$32.70**	

>6 GB to <10 GB of data

American Broadband and Telecommunications (LL)	$51.00	8
Safety Net (R)	$60.00	8
Safety Net (R)	$68.00	9
Average Price	**$59.67**	

10 to <15 GB of data

Tello	$19.00	10
Red Pocket (LL)	$25.00	10
Life Wireless (LL)	$30.00	10
TruConnect (R, P)	$30.00	10
TracFone (R, P)	$30.00	10
AirVoice (R, P)	$30.00	10
TracFone (LL)	$30.00	10
Gen Mobile (R, P)	$30.00	11
Dish (LL)	$30.00	12
Consumer Cellular	$35.00	10

T-Mobile	$40.00	10
Cricket Wireless	$40.00	10
Safety Net (R)	$75.00	10
Average Price	**$34.15**	

15 GB to 17 GB of data

Mint	$20.00	15
Tello	$24.00	15
Total Wireless (R, P)	$30.00	15
Simple Mobile (R)	$40.00	15
Dish (LL)	$40.00	17
Gen Mobile (R, P)	$40.00	17
AirVoice (R, P)	$42.00	16
Safety Net (LL)	$65.25	15
Average Price	**$33.71**	

20 GB to 25 GB of data

Red Pocket (R)	$20.00	20
Mint	$25.00	20
SafeLink Wireless (R, P)	$28.25	25
Red Pocket (LL)	$30.00	20
TracFone (R, P)	$40.00	20
TracFone (LL)	$40.00	20
AirVoice (R, P)	$48.00	25
Assurance (LL)	$60.00	25
Verizon	$60.00	25
Average Price	**$39.03**	

>25 GB of data

Red Pocket (R)	$30.00	50
Red Pocket (LL)	$40.00	30
Safety Net (LL)	$80.25	30
Average Price	**$50.08**	

Key

MVNO, does not participate in California LifeLine
MVNO, California LifeLine Participant
Facilities-based provider or affiliate of facilities-based provider, California Lifeline participant
Facilities-based provider, does not participate in California LifeLine
(R) = retail plan
(R, P) = prepaid retail plan
(LL) = California LifeLine plan

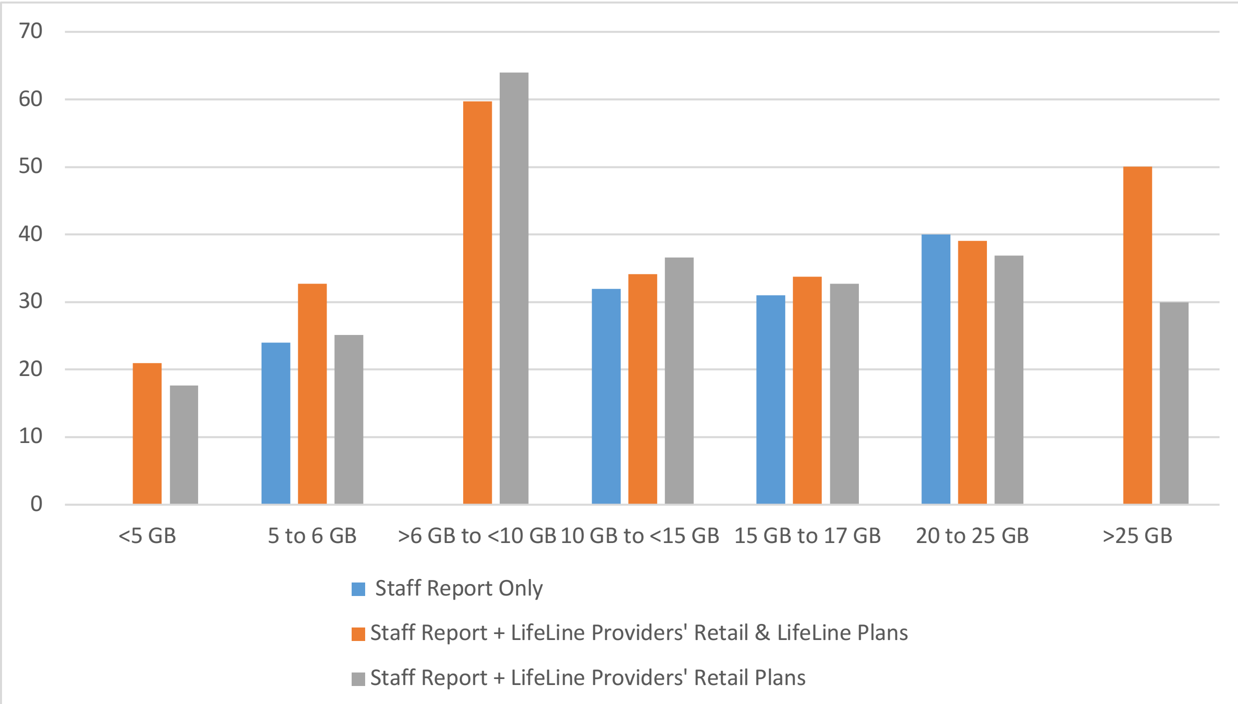
To determine if a provider's LifeLine participation affected its service offerings, or if a LifeLine provider's LifeLine plans significantly differed from its retail service offerings, TURN compared the averages of each group of mobile service offerings in Figure 1 (depicted in orange in the bar graph in Figure 3) to a version of Figure 1 with all LifeLine plans removed (in gray in the bar graph) and to those from the Staff Proposal (in blue in the bar graph). The results are depicted in Figures 2 and 3, below.

Figure 2. Average Prices of Retail and California LifeLine Wireless Service Offerings (Table)

Data Allowance	**Staff Report Only**	**Staff Report + LifeLine Providers' Retail & LifeLine Plans**	**Staff Report + LifeLine Providers' Retail Plans**
<5 GB	N/A	$20.95	$17.69
5 to 6 GB	$24.00	$32.70	$25.11
>6 GB to <10 GB	N/A	$59.67	$64.00
10 GB to <15 GB	$32.00	$34.15	$36.56
15 GB to 17 GB	$31.00	$33.71	$32.67
20 to 25 GB	$40.00	$39.03	$36.88

>25 GB	N/A	$50.08	$30.00

Figure 3. Average Prices of Retail and California LifeLine Wireless Service Offerings (Bar Graph)



Figures 2 and 3 compare the average cost of wireless plans in seven groups based on the amount of data offered. In four of these groups, the highest average costs come from the dataset that included both LifeLine providers' retail and California LifeLine plans. In two of these groups, the highest average costs come from the dataset that included LifeLine providers' retail plans. In three of the four groups that included the Staff Proposal dataset, which included only a small number of LifeLine providers' retail plans, the other datasets had a higher monthly average cost of service. In five of the seven overall groups, the dataset including both LifeLine providers' retail and California LifeLine plans had a higher average monthly cost than the dataset containing only LifeLine providers' retail plans. This analysis indicates that, to some degree, there continues to be differences in wireless providers' pricing and data offerings that correlate with whether they participate in California LifeLine. Therefore, TURN recommends that the Commission and Staff keep wireless service providers' LifeLine participation in mind when assessing wireless market offerings. This analysis also underscores the importance of considering the service offerings of wireless providers that *do not* participate in LifeLine to fully assess the state of the market.

2. Other Data Suggests Average American Mobile Data Consumption May be Higher than 15.5 GB per Month.

The Staff Report cites an FCC statistic that "the average monthly data consumption for smartphone users reached 15.5 GB" in 2023.[20] TURN notes that other, more recent sources have estimated this average to be higher. In November 2025, Ericsson released a report estimating that estimated 2023 monthly data consumption per smartphone in North America to be approximately 19.17 GB per month.[21] Somewhat relatedly, the National Lifeline Association's (NaLA) 2024 Annual Consumer Survey of some 68,000 consumers found that 20 GB of data or more was

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[20] Staff Proposal at p. 16.

[21] Peter Jonsson, ed., Ericsson Mobility Report (November 2025), Ericsson, available at https://www.ericsson.com/4aca6f/assets/local/reports-papers/mobility-report/documents/2025/ericsson-mobility-report-november-2025.pdf, at p. 14. For an interactive graph, *see also* Ericsson, Mobile data traffic outlook, available at https://ericsson.com/en/reports-and-papers/mobility-report/dataforecasts/mobile-traffic-forecast (last accessed Jan. 5, 2026). This variation from the 2023 FCC statistic does not appear to be the result of higher mobile data consumption by another large North American country, as Canada reported an average mobile data consumption of 7 GB per month in 2023, and Mexico reached an average mobile data consumption of 6 GB in the fourth quarter of 2023. Canadian Radio-Television and telecommunications commission, Canadian Telecommunications Market Report (2025), available at https://crtc.gc.ca/pubs/cmr_ctmr_2025-en.pdf, at p. 60; Telecompaper, Mexican mobile data consumption up to average 6GB a month in Q4 (Mar. 15, 2023), available at https://www.telecompaper.com/news/mexican-mobile-data-consumption-up-to-average-6gb-a-month-in-q4--1456815.

necessary for their household's internet access needs.[22]

To the extent that the Commission and Staff expect to use average national data consumption in setting the wireless LifeLine MSS, TURN respectfully recommends that they consider multiple sources on average data consumption and investigate the underlying methodologies of each.

C. Customer Co-Payments

1. TURN Supports Moving Subscribers Who do not Pay Their Co-Payments to Zero Co-Payment Plans.

The Staff Proposal would establish five tiers of wireless LifeLine service, two of which would have subscriber co-payments.[23] The Staff Proposal also proposes to require providers to design co-payment plans so that subscribers who do not pay their co-payments will be moved to a zero co-payment plan.[24] TURN strongly supports this approach, as it would provide continuity of service for wireless subscribers in the event that their co-payment becomes unaffordable.

D. TURN Supports Equal Application of the Non-Usage Rule.

The Staff Proposal would expand the existing non-usage so that it applies to all California LifeLine subscribers, including those who pay a monthly fee for their LifeLine service.[25] TURN supports this change, as it would improve program efficiency by subjecting subscribers to the same rule. However, TURN recommends that providers be required to educate their subscribers about this rule change in advance so that no subscriber inadvertently loses their LifeLine service. To ensure effective subscriber notice, this subscriber outreach should include multiple formats,

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[22] NaLA, 2024 Annual Consumer Survey, Jan. 2025, available at https://eqm2782zctq.exactdn.com/wp-content/uploads/2025/01/NaLA-Annual-Consumer-Survey-CORRECTED-1.31.25.pdf, at p. 9. "20 GB or more" was the second most common response after "I am not sure" to the question of how much data the respondent's household needed in a moth. *Id.*
[23] Staff Proposal at pp. 15-16.
[24] Staff Proposal at p. 20.
[25] Staff Proposal at p. 17.

such as text messages and, if possible, e-mail.

E. The Commission Should Consider Secondary Effects of a Reduction in the Wireless Connection and Activation Charge.

The Staff Proposal would reduce the LifeLine activation and connection charge from an up to twice annual payment of $39 to a once annual payment of $15 per provider.[26] TURN does not object to a reduction of the activation and connection charge in concept. As the Staff Proposal notes, there has been a high degree of churn among wireless subscribers,[27] which raises the question of impact of activation fee payments on the California LifeLine fund. However, the Commission should consider whether this change would impact wireless service provider's offerings, especially whether wireless providers would begin charging subscribers the partial or full cost for a handset when they initiate LifeLine service with that provider. The upfront cost of a handset would likely make LifeLine service unaffordable for some households. TURN reserves the right to discuss this issue further in reply comments.

IV. WIRELINE ISSUES

A. TURN Supports Updating the Wireline SSA Methodology, but the Commission Should Take Steps to Clarify Enforcement and Ensure Affordability.

Wireline service options remain a critical component of the LifeLine program. As the Staff Report notes, an average of 117,000 wireline subscribers enrolled in the California LifeLine program in 2024.[28] While the Commission has declined to make as sweeping changes to the wireline SSA as it has for wireless services, TURN appreciates the proposed changes to tailor the wireline SSA but urges the Commission to take a forward-looking approach to affordability and enforcement.

[26] Staff Proposal at pp. 17-18.
[27] Staff Proposal at p. 18.
[28] Staff Proposal at p. 18, fn 40.

1. The Commission May Need to Update the Wireline SSA Yearly as Provider Prices Increase and to Comply with the Public Utilities Code.

The Staff Proposal would replace the COLR method of setting the wireline SSA with an annual rate review based on individual providers' basic service rates, from which the Commission will derive the SSA (55% of the provider's basic service rate plus end user common line charges) and LifeLine rate for that provider.[29] The wireless SSA would be capped at $19.[30]

One of the largest burdens that California wireline LifeLine subscribers face is the increasing costs of service year-over-year. With the COLR methodology, the wireline SSA for all providers is subject to the rising rates that some providers claim are needed to maintain their legacy networks.[31] While many other providers' rates have stayed stable or increased minorly, AT&T California's (AT&T) rates continue to increase each year.[32] From 2014 to 2023, AT&T's rates have risen by $9.50, whereas in the same time other providers, such as Frontier, have only increased rates by $3.50.[33] In 2025, AT&T announced that starting on January 1, 2026, consumers would again face a price increase for basic service.[34] This most recent price increase adds an additional $6.52 to a consumer's copay for a monthly total of $25-26, depending on geographic area.[35] As a result, the Staff Proposal's conclusion that subscribers' bills will remain affordable is speculative.

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[29] Staff Proposal at p. 19.
[30] Staff Proposal at p. 19.
[31] AT&T Advice Letter 50171 (ATT AL 50171),submitted Dec. 19, 2025, at p. 15.
[32] *See* California Public Utilities Commission, Staff Proposal on LifeLine Specific Support Amount and Minimum Service Standards (November 2023 SSA Staff Proposal), issued Nov. 6, 2023, at p. 3, Table 1, available athttps://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M520/K709/520709200.PDF (highlighting the COLR rates of wirelines service provides from 2014 through 2023).
[33] November 2023 SSA Staff Proposal at p. 3, Table 1.
[34] ATT AL 50171 at p. 15.
[35] ATT AL 50171 at pp.12-14.

Similarly, such a routine increase in rates by one provider cuts directly against the pricing stability the Staff Proposal is seeking to create.[36] If even a single provider's prices continue to increase significantly year-over-year, it likely will require the Commission to reassess the wireline SSA cap on a semi-regular basis.[37]

Further, as discussed above, the Commission makes no mention of how it intends to satisfy the requirements of Section 873 of the Public Utilities Code. Section 873 requires the Commission to annually set the rates and charges for each class of LifeLine service necessary to meet minimum communications needs.[38] The regular increases in the cost of basic service and the requirement of Section 873 could effectively result in the Commission regularly updating the wireline SSA.

2. The Commission Should Adopt a Cap on Wireline LifeLine Co-payments.

As TURN has recognized in the past, co-payments can burden LifeLine subscribers.[39] That concern remains. In 2024, NaLA found that 94.4% of respondents could not afford additional monthly payments toward their Lifeline- or Affordable Connectivity Program-supported services.[40] At the same time, approximately 60.5% of respondents stated they would not be able to pay for the same services without Lifeline, indicating that any increase in cost would price them out of the services they currently use.[41] In conjunction, the Staff Proposal notes that even a $5 co-payment for wireless LifeLine service would utilize 100% of some households'

[36] Staff Proposal at p. 19.
[37] Staff Proposal at p. 19.
[38] CA Pub Util Code § 873(a)(2).
[39] Reply Comments of the Utility Reform Network on the Administrative Law Judge's Ruling on Subsidy and Service Standard Staff Proposal (TURN 2024 Reply Comments), filed in R.20-02-008 on Feb. 16, 2024 at p. 27.
[40] NaLA, 2024 Annual Consumer Survey at p. 6.
[41] NaLA, 2024 Annual Consumer Survey at p. 7.

non-discretionary income for communications services and therefore make LifeLine unaffordable for them.[42]

Current Lifeline program rules still do not guarantee reasonable wireline co-payments. For some subscribers, co-payments increase every year, while others' co-payments have remained relatively stable. As TURN highlighted above, this year AT&T's co-payment will increase to be more than Frontier's *unsubsidized* 2024 COLR basic flat service rate.[43] In order to keep wireline co-payments reasonable, the Commission should consider modifying LifeLine program rules to no longer require wireline copays. To do this, TURN proposes the following modification to General Order 153, Rule 9.3.2.2:

> Beginning January 1, 2027~~13~~, there will no longer be an assumed payment floor ~~of $5.00~~ for California LifeLine Flat Rate Service in the calculation of the SSA recovery.

Furthermore, TURN recommends the Commission monitor wireline co-payments and adopt a cap on them. If the Commission does determine that a cap on co-payments is necessary, utilizing affordability metrics like the Affordability Ratio may provide a consistent methodology for the Commission to assess the affordability of co-payments.

If the Commission were to remove mandatory co-payments from the Lifeline program, it would provide new flexibility in how the SSA and MSS could be structured to ensure that those who want wireline service are able to afford it without the potential that an increasing co-pay will price them out of wireline service. In doing so, the Commission would take another step towards its goal of connecting every California LifeLine subscriber to the services that best meet their needs.

3. The Commission Must Plan for the Phase-Out of Federal Lifeline Voice Support.

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[42] Staff Proposal at p. 12, Table 6.
[43] *See* Staff Proposal at p. 19, Table 11.

Currently, the Federal Communications Commission (FCC) is set to phase voice-only support out of the federal Lifeline program on December 1, 2026.[44] The Staff Proposal asserts that "over time, as federal subsidies change and wireline service providers adjust their rates, the Commission may consider updates to the MSS/SSA to ensure that wireline service is adequately subsidized. However, based on the historic service provider rate increases and federal subsidies, staff do not anticipate this will happen for many years."[45]

This approach raises concerns on two counts. First, the FCC has been in the process of phasing out voice-only support from the federal Lifeline program since 2019. Today, consumers are only able to receive $5.25 in federal support for voice-only service. While the FCC has sustained this level of support since 2021, given the current climate of legacy network retirements and increased "cost saving" mentality at the federal level, the Commission should not assume that federal support will remain consistent.

However, the Commission has already created a strategy to help lessen the impact of the federal phase-out of voice-only Lifeline support. In D.20-02-004, the Commission authorized California LifeLine to replace $2.00 per month of reduced federal support for wireline participants from and has since extended that funding indefinitely.[46] When extending this federal make-up, the Commission concluded that a reduction in federal support for voice-only wireline services would increase rates to the consumer and that replacement funding was warranted.[47] However, the Staff Proposal takes a hands off approach to an issue that could become relevant

[44] *In re Lifeline and Link Up Reform and Modernization* et al., WC Dkt Nos. 11-42, 09-197, 10-90, Order, 40 FCC Rcd 4325, para. 9 (2025).
[45] Staff Proposal at p. 19.
[46] D.21-09-023, issued in R.20-02-008 on Sept. 24, 2021, at COL 7, OP 5.
[47] D.20-10-006, issued in R.20-02-008 on Oct. 16, 2020, at p. 24.

for the thousands of wireline California LifeLine subscribers who also receive the federal subsidy.

Additionally, California LifeLine already makes up the full amount of federal support for subscribers who only meet California-only eligibility criteria would have received if they had met federal eligibility requirements.[48] If wireline voice-only support is further reduced, the Commission already has a precedent of standing in for the federal subsidy.

The Commission should continue to be forward looking and develop a plan for the very real possibility that federal support for voice-only services may phase out in the near term. Taking a wait-and-see approach all but guarantees that some households will fall through the gaps and be priced out of wireline LifeLine service.

4. The Commission Must Clarify How It Intends to Enforce Section 874 of the Public Utilities Code.

The Staff Proposal notes that under Public Utilities Code Section 874, wireline service providers are disallowed from charging LifeLine subscribers over 50% of their basic residential rates.[49] However, the Staff Proposal does not provide any details on how the Commission will enforce the Public Utilities Code in the event that a provider charges a subscriber more than 50% of their basic residential rate.

Resolution T-17601 approved a citation program to enforce compliance by telecommunications carriers with Commission actions and the Public Utilities Code.[50] However, Resolution T-17601 does expressly authorize Communications Division staff to issue citations for the violation of Section 874 of the Public Utilities Code. Therefore, TURN recommends that

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[48] D.20-02-042, issued in R.11-03-013 on Mar. 4, 2020, at OP 1.
[49] Cal. Pub. Util. Code § 874(b)(2).
[50] *See generally* Resolution T-17601, issued June 22, 2018.

the Commission either modify T-17601 to authorize Staff to enforce Section 874 or otherwise clarify how it intends to enforce Section 874.

The existing Resolution T-17601 citation program requires that the citation served upon the telecommunications carrier by the Commission will include a specification of the violation;[51] a statement of the facts upon which the alleged violation is based;[52] the fine amount;[53] a statement that the Respondent may correct the violation and pay the amount of the penalty or file an appeal within 30 days;[54] how to file an appeal;[55] the appropriate forms;[56] and a notice that the Communications Division has approved the citation.[57] This framework provides a sound base for how the Commission may respond to violations of Section 874, but the Commission should seek comment whether this type of citation process would be effective or comprehensive enough to accommodate new enforcement efforts. As the Commission explores how best to maintain affordable LifeLine service, the response to a provider over-charging subscribers should be clear and established.

B. TURN Supports the Proposed Broadband MSS.

The Staff Proposal would create a wireline broadband MSS (for broadband bundled with wireline voice) of 100/20 Mbps for and adopt the FCC's data allowance MSS.[58] The FCC's current data allowance MSS is 1280 GB per month.[59] TURN supports these proposed MSS. Both the speed and data MSS match the MSS in the Commission's Home Broadband Pilot.[60] Per the

[51] Resolution T-17601 at p. 5.
[52] Resolution T-17601 at p. 5.
[53] Resolution T-17601 at p. 5.
[54] Resolution T-17601 at p. 5.
[55] Resolution T-17601 at p. 6.
[56] Resolution T-17601 at p. 6.
[57] Resolution T-17601 at p. 6.
[58] Staff Proposal at p. 20.
[59] Staff Proposal at p. 20, fn 45.
[60] *See* D.25-08-050, issued in R.20-02-008 on Sept. 4, 2025, at COL 13.

most recent OpenVault Broadband Insights Report, which covers the third quarter of 2025, monthly average broadband data consumption is at 640.8 GB (down from 664.2 GB in the prior quarter), and median monthly data consumption was approximately 438.9 GB.[61] The FCC MSS comfortably exceeds both figures. Moreover, setting the speed MSS at 100/20 Mbps and tying the data MSS to the FCC MSS would maximize eligibility for federal Lifeline subsidies.

Additionally, as with the Home Broadband Pilot, TURN recommends that the Commission create a waiver process for providers that want to offer bundled LifeLine service but do not currently have networks that can deliver 100/20 speeds throughout their service territory.[62]

V. PROPOSED REDLINES TO GENERAL ORDER 153

A. The Proposed Redlines Should Codify the Treatment of Subscribers with Co-Payments Who do not Pay Their Co-Payments.

The Staff Proposal also proposes redlines to General Order (GO) 153, the general order that codifies the LifeLine program rules, to implement the recommended changes in the Staff Proposal. As discussed above, the Staff Proposal would require providers to design their wireless service offerings so that subscribers on plans with co-payments will be moved to zero co-payment plans in the event that they do not pay their co-payment.[63] TURN recommends that the redlines to GO 153 includes a codification of this requirement and proposes the following language be added to GO 153:

> x.x.x If a wireless California LifeLine Subscriber on a plan with a copayment does not pay their copayment, they will remain enrolled in California LifeLine and be transferred to their Service Provider's standard plan.
>
> x.x.x Wireless California LifeLine Service Providers may not charge California

[61] OpenVault, 3Q25 Report: A DOCSIS 3.1 Breakout in a Norm-Breaking Year, Nov. 12, 2025, downloaded from https://openvault.com/resources/ovbi/, at pp. 8, 10.
[62] *See* D.25-08-050 at COL 14.
[63] Staff Proposal at p. 16.

LifeLine Subscribers a conversion fee for transitioning between different service plan tiers.
. . . .
9.4.x Any costs associated with transitioning California LifeLine Subscribers between different service plan tiers.

B. The Commission should Revise the Proposed Wording of 5.7.3 to be Clarify the Timeline for Subscriber Notice of Non-Usage.

The proposed redlines to GO 153 include codification of service provider requirements regarding non-usage, which includes notifying inactive subscribers that they will be de-enrolled from California LifeLine if they do not begin using their service within 15 days. TURN recommends the following slight modification to the proposed Section 5.7.3 to make clear *when* providers must notify inactive subscribers:

> 5.7.3 LifeLine Service Providers must send a clear non-usage notice to subscribers ~~for~~ after 30 consecutive days of inactivity; if service is not used within 15 days of the notice, deenrollment from the program will occur.

C. The Proposed Redlines Should Clarify that Wireless Co-Payment Amounts are Maximum Co-Payments.

Appendix C of GO 153 includes a table listing the tiers of wireless LifeLine service, which the Staff Report would update to reflect the proposed new MSS. Part of this update includes adding a column to the table labeled "Copay" to reflect the maximum customer co-payment for each tier of service.[64] TURN recommends labeling this new column "Maximum Copayment" instead to match the language in the Staff Proposal[65] and make clear that the customer co-payment for each tier of wireless LifeLine service is capped.

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[64] Staff Proposal at GO 153 Appendix, Appendix C, p. 1.
[65] *See* Staff Proposal at p. 20.

VI. CONCLUSION

TURN appreciates Staff's work on the Staff Proposal and the Commission taking up the issue of updates to the SSA and MSS. TURN looks forward to discussing these issues further in reply comments.

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Respectfully submitted,

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