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PUBLIC UTILITIES COMMISSION

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TO PARTIES OF RECORD IN RULEMAKING 23-11-001:

This is the proposed decision of Commissioner Darcie L. Houck. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's February 26, 2026 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

/s/ MICHELLE COOKE

Michelle Cooke
Chief Administrative Law Judge

MLC:avs
Attachment

COM/DH7/avs

PROPOSED DECISION

Agenda ID #23966
Quasi-legislative

Decision **PROPOSED DECISION OF COMMISIONER HOUCK**
(Mailed 1/15/2026)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Revisions and Updates to
the Deaf and Disabled
Telecommunications Program.

Rulemaking 23-11-001

DECISION ESTABLISHING REVISIONS AND UPDATES TO THE DEAF AND DISABLED TELECOMMUNICATIONS PROGRAM (CALIFORNIA CONNECT)

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**DECISION ESTABLISHING REVISIONS AND UPDATES TO
THE DEAF AND DISABLED TELECOMMUNICATIONS PROGRAM
(CALIFORNIA CONNECT)**

Summary

This decision updates the California Public Utilities Commission's Deaf and Disabled Telecommunications Program, also known as California Connect, through a series of revisions and improvements. California Connect is a state-mandated initiative of the Commission. The initiative provides specialized and accessible communication equipment; relay services; and Augmentative Alternative Communication, such as speech generating devices, to Californians with hearing, speech, physical, cognitive, visual, or memory disabilities. These updates align the program with advances in communications technology and enhance its ability to meet the needs of people with disabilities. These updates address the verification process; application process; program consolidation and branding; community outreach and partnerships; collaboration with other assistance programs; integration with emergency response agencies; procurement of equipment, services, and technology upgrades; procurement and distribution processes; expanded service access; advisory committee charters updates; future needs assessments and surveys; financial and operational considerations; and jurisdictional issues related to Voice Over Internet Protocol.

This proceeding is closed.

1. Background

1.1. Factual Background

The Deaf and Disabled Telecommunications Program (DDTP), also known as California Connect, provides basic telephone communication access to eligible people in California who are deaf or have other disabilities and have functional limitations with hearing, vision, movement, manipulation, or speech. There have

been many advancements and changes in communications technology since the program was initially implemented in the 1970s and 1980s. Given these changes, Order Instituting Rulemaking (R.) 23-11-001 was initiated to consider whether California Connect should be updated to better serve the needs of these communities.

1.2. Procedural Background

R.23-11-001 was opened on November 9, 2023, to allow the Commission to consider the need for revisions and updates to the California Connect program. Opening comments were filed on January 9, 2024, by: The Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), Center for Accessible Technology (CforAT), California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH), the National Diversity Coalition (NDC), and Calaveras Telephone Company, Cal-Ore Telephone Company, Ducor Telephone Company, Foresthill Telephone Company, Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Company, Pinnacles Telephone Company, The Ponderosa Telephone Company, Sierra Telephone Company, The Siskiyou Telephone Company, Volcano Telephone Company, and Winterhaven Telephone Company (collectively, the “Small LECs”).

Reply comments were filed on January 22, 2024, by: Pacific Bell Telephone Company (AT&T), CforAT, TURN, Cal Advocates, and Cox California Telcom, LLC (Cox).

A prehearing conference (PHC) was held on February 9, 2024, to address the issues of law and fact, discuss the scope, schedule, and address other matters. Due to technical difficulties at the PHC, the Administrative Law Judge (ALJ) issued a ruling authorizing post-PHC comments. The ruling was sent via email

on February 9, 2024, with comments due on February 26, 2024. No party filed post-PHC comments.

On September 12, 2024, the ALJ issued a ruling requesting additional information from the parties to assist the Commission in resolving the scope of issues. A series of questions was provided, and parties were requested to provide answers or additional information. Opening comments were filed by Cal Advocates and jointly by TURN and CforAT. No party filed reply comments.

On May 14, 2025, the ALJ issued a ruling inviting parties to review and comment on a Staff Proposal prepared by the Commission's Communications Division (Staff Proposal). Opening comments were filed jointly by TURN and CforAT. No other party provided opening or reply comments to the Staff Proposal.

1.3. Public Participation Hearings

A series of Public Participation Hearings (PPHs) were held throughout the state to give the public an opportunity to learn about and express their opinions on the issues in this proceeding. The first round of PPHs were held in 2024 and consisted of eight PPH sessions. PPHs were held on August 15th in Roseville, September 4th in Buena Park, September 11th in Clovis, and September 17th virtually.

A second round of five PPHs were held in 2025, due to low attendance at the 2024 PPHs. PPHs were held on May 16th in Oakland, September 3rd in Los Angeles, and September 17th in Berkeley. The May 16th PPH was held at and immediately prior to the Telecommunications Access for the Deaf and Disabled Administrative Committee (TADDAC) and the Equipment Program Advisory Committee (EPAC) Joint Business Meeting. Participants were both in person and remote. The September 3rd PPH was held in collaboration with the

Greater Los Angeles Agency on Deafness (GLAD)¹ and the September 17th PPH was held in collaboration with the Center for Independent Living at the Ed Roberts Campus.²

2. Submission Date

This matter was submitted on September 17, 2025, upon holding and receiving public comments at the final PPH in Berkeley.

3. About California Connect

California Connect is a state-mandated initiative of the Commission that provides communication equipment and services to eligible Californians with hearing, speech, physical, cognitive, visual, and memory disabilities at no charge. Three types of services are offered: the Equipment Distribution Program (EDP), the California Relay Service (CRS), and Augmentative Alternative Communication (AAC) including Speech Generating Devices (SGD). All California telecommunications public purpose programs, including California Connect,³ are funded by a single, flat-rate surcharge assessed on each access line (essentially each phone number) in California.⁴ The surcharge is currently set at \$0.90 per month.⁵ Subscribers to the California Universal Telephone program (LifeLine) and incarcerated persons are exempt from paying the surcharge.⁶

¹ GLAD is located at 2222 Laverna Ave., Los Angeles, CA 90041.

² The Ed Roberts Campus is located at 3075 Adeline St, Berkeley, CA 94703.

³ Public Utilities Code Section 270 and its subsections establishing the public purpose programs refer to California Connect as the DDTP.

⁴ See generally Decision (D.) 22-10-021.

⁵ See CPUC Surcharge Rates. <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees/surcharge-rates>.

⁶ D.22-10-021 at 39.

To qualify for California Connect and receive accessible communications equipment and services, the applicant must reside in California and be certified as having one or more disabilities in hearing, vision, mobility, speech, or cognition.⁷ There is no age or income requirement.⁸

3.1. Equipment Distribution Program (EDP)

EDP provides specialized communications equipment and services to eligible individuals with disabilities. Devices offered through EDP include specialized phones for people who are hard of hearing, cordless speakerphones for those with mobility difficulties, and picture phones for those with cognitive disabilities. A comprehensive list of EDP's available equipment can be accessed online.⁹ Although many phones available through EDP are landline-based, several accessories are compatible with mobile phones, including cell phone amplifiers. EDP also provides services such as installation, training, and troubleshooting. To obtain device assistance, users can:

- Call the Contact Center, where the consumer would receive assistance remotely;
- Visit one of the 15 California Connect Service Centers for in-person assistance; or
- Schedule a visit with a Field Advisor who would be dispatched to the consumer's home to diagnose problems, provide training if needed, repair the device, or provide a replacement.

⁷ See Staff Proposal at 5.

⁸ See California Connect Frequently Asked Questions, <https://caconnect.org/apply/faqs/>. In this proceeding, certain parties recommended implementing minimum age requirements for enrollment into California Connect, but because the program does not have an age requirement, these recommendations are moot, so we do not address them in this decision.

⁹ <https://caconnect.org/equipment-services/>

3.2. California Relay Service (CRS)

CRS is a service where a trained third-party operator relays a call from a person with a disability to the individual or entity they are calling. To access CRS, the subscriber dials 711 from their phone to be connected to a communications assistant. The assistant then makes the call to the person the subscriber is calling. CRS offers three service types:

- Traditional Relay Service (TRS) enables an individual who is deaf or hard of hearing to place and receive phone calls using a teletypewriter (TTY)/Text Telephone Device (TDD). TRS relay utilizes a three-way call to include a communications assistant which types and voices what the other caller is conveying.
- Captioned Telephone Service utilizes a specialized caption telephone with a screen displaying text in which a communications assistant types what the other party is saying. A screen attached to the telephone displays the text for the caller to see while the caller utilizes their own voice for the other caller to hear. This service is commonly used for individuals who can speak for themselves but have difficulty hearing.
- Speech-to-Speech (STS) provides the speech caller with a communications assistant in a three-way call to revoice what the caller says to the other person on the telephone call. Individuals with speech disabilities rely on communications assistants who are trained to understand speech disabilities to revoice their words to the called party.

3.3. Augmentative Alternative Communication (AAC) including Speech Generating Devices (SGD)

AACs are assistive devices that allow individuals with speech impairments to communicate, often utilizing devices enabling synthesized or digitized speech. These devices are often specialized and enable users to express themselves by typing or selecting symbols or pictures. SGDs are crucial for

individuals who have difficulty speaking, preventing isolation and enabling them to participate more fully in daily life. California Connect is the provider of last resort for SGDs,¹⁰ meaning an individual must exhaust all available public and/or private insurance resources prior to applying for California Connect. If an individual's medical insurance will only cover a portion of an SGD's cost, then the person can apply to California Connect for coverage of the balance. Similarly, if the customer's insurance policy does not cover SGDs or if the customer does not have medical coverage at all, the person can also apply for California Connect. Other SGDs offered through California Connect outside of the provider of last resort are iPads with speech applications.¹¹

Decision (D.)13-03-008 established a pilot program, known as the Voice Options Pilot for the distribution of "supplemental telecommunications equipment." The Voice Options Pilot included the distribution of iPad tablets and other assistive devices. The provider of last resort provisions do not apply to the provision of iPads with speech applications since the Voice Options program was initially envisioned by the Commission as a standalone pilot program.

4. Needs Assessment Report

Under Public Utilities Code (Pub. Util. Code) Section 2881(k), the Commission must perform an ongoing assessment of California Connect in its entirety and, if appropriate, expand its scope to allow for additional access capability consistent with evolving telecommunications policy. To this end, the Commission's Communications Division conducted a Needs Assessment Report

¹⁰ Pub. Util. Code Sections 2881(d) and 2881(e)(1) designates DDTP (California Connect) as the provider of last resort. This means customers must seek medical reimbursement before California Connect will pay for the SGD.

¹¹ More information about the origin of the Voice Options Pilot can be found here: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M324/K941/324941883.PDF>

(Needs Assessment) to collect information on issues faced by people who are deaf or have other disabilities. Completed in March 2020 and released in December 2021, the Needs Assessment utilized a three-prong approach to gathering data for the analysis, which included the following:

- In-person engagements and visits with Community-Based Organizations (CBOs);
- A CBO questionnaire; and
- An online survey for participants who could not attend the in-person engagements.

In summary, the Needs Assessment concluded that gaps exist between what California Connect presently offers and the current needs of people who are deaf or have other disabilities, and that California Connect has not evolved with advances in technology and participant needs. Other than the addition of AAC funding and the Voice Options Program in recent years, California Connect is designed around legislation and policies developed from the 1970s and 1980s. When legislation was initially passed in 1979, telephone equipment and services were purely landline-based.¹² Despite the shift in preference from copper services and consumers' increasing reliance on Voice Over Internet Protocol (VoIP), wireless phones, and other internet protocol (IP) enabled devices, California Connect continues to offer landline phones and primarily landline accessories. The Needs Assessment identifies various additional barriers faced by people who are deaf or have other disabilities and makes recommendations on how to address the barriers.¹³ The Needs Assessment was issued for party

¹² Also known as plain old telephone service, which is phone connected to a copper wire.

¹³ The full Needs Assessment Report is included in the OIR issued 11/2/2023 as Appendix A.

comment, and this decision addresses whether those recommendations should be adopted in whole, in part, or with modifications.

5. Issues Before the Commission

Opening and reply comments to this rulemaking¹⁴ were considered in the development of the Scoping Memorandum and Ruling (Scoping Memo). On April 10, 2024, the assigned Commissioner issued the Scoping Memo setting the following issues:¹⁵

1. Whether the Commission should modify California Connect rules in light of the changing communications landscape and participant needs, and if so, how;
2. What services and equipment, either existing or new equipment including web-based application solutions that work with smart phone technology, should be offered by California Connect (including additional support during emergency situations);
3. Whether barriers exist that prevent eligible participants from enrolling in California Connect and how to overcome those barriers;
4. Whether California Connect can be, or should be, coordinated with other consumer programs to increase program awareness, enrollment, and efficiency;
5. Whether there is a need to enhance education, outreach, partnerships, and training to increase awareness and technical proficiency of California Connect, and if so, how;
6. Whether the California Connect , or DDTP Advisory Committee charters require any updates and how such updates should be made;
7. Whether the Needs Assessment recommendations should be adopted in whole, part, or with modifications;

¹⁴ Opening comments were received on 1/9/2024. Reply comments were received on 1/22/2024.

¹⁵ Note that the Scoping Memo refers to California Connect as DDTP.

8. Whether there will be a funding impact due to changes in rules or expansion of offerings and services of California Connect, and if so, how the funding needs should be addressed;
9. Whether improvements or updates to California Connect will result in any new mandates or raise any jurisdictional issues on telecommunications providers, including VoIP, wireless, or broadband issues; and
10. Whether there are any potential impacts on Environmental and Social Justice (ESJ) communities, including the extent to which modifications to California Connect impact the achievement of any of the nine goals of the Commission's ESJ Action Plan.

6. Jurisdiction

This rulemaking is being conducted in accordance with Article 6 of the Commission's Rules of Practice and Procedure (Rules). In 1979, the California Legislature enacted Pub. Util. Code Section 2881 et. seq., which codified DDTP, now marketed as California Connect following the completion of the Needs Assessment. The Commission implemented Pub. Util. Code Section 2881 through a series of decisions issued in the 1970s and 1980s.

California Connect originally provided specialized telecommunications equipment to individuals who are deaf and hard of hearing.¹⁶ The Commission later expanded the program to include disability groups that have functional

¹⁶ Senate Bill (SB) 597, Stats. 1979, Ch. 1142 directed the Commission to design and implement a program to provide telecommunications services for the deaf (TDDs) without charge to certified deaf or hearing-impaired users. SB 227, Stats. 1985, Ch. 1182 required California Connect to provide telecommunications devices to state agencies for public access by deaf or severely hearing-impaired individuals. Assembly Bill (AB) 3369, Stats. 1984, Ch. 1741 authorized telephone companies to distribute teletypewriters to non-profit organizations and schools. *See*, D.92603 (Jan. 1981), D.85-11-043; D.86-02-042; D.87-04-027; D.87-10-077; D.88-05-065; D.88-07-033; and D.89-05-060.

difficulty using the phone.¹⁷ Subsequent legislation augmented Pub. Util. Code Section 2881's requirements, expanding the program's scope to provide a dual-party relay system, specialized telecommunications equipment to other disability groups, and funding for SGDs. Assembly Bill 136 (Beall, 2011, Ch. 404) modified Pub. Util. Code Section 2881 by adding speech-language pathologists (SLP) as authorized California Connect Certifying Agents. It directed the Commission to be the provider of last resort for SGDs.

6.1. Pub. Util. Code Section 2881

Pub. Util. Code Section 2881 governs California Connect as follows:

1. Pub. Util. Code Section 2881(a) authorizes the Commission to provide TTYS to deaf or hard of hearing individuals.
2. Pub. Util. Code Section 2881(b) authorizes the Commission to provide a dual-party relay system, also known as CRS,¹⁸ using a third-party assistant to connect telephone consumers who are deaf or hard of hearing with other parties.¹⁹
3. Pub. Util. Code Section 2881(c) authorizes the Commission to provide other specialized telecommunications equipment to consumers who are certified with having hearing, vision, mobility, speech, or cognitive disabilities at no charge.

¹⁷ SB 60, Stats. 1985, Ch. 585; D.89-05-060.

¹⁸ The Federal Communications Commission certified California's dual-party relay system pursuant to Section 401 of the Federal Americans with Disabilities Act of 1990 (Public Law 101-336).

¹⁹ SB 244, Stats. 1983, Ch. 741 directed the Commission to create a 24-hour dual party relay program. AB 3369 authorized TDD distribution to organizations representing the deaf or severely hearing-impaired.

4. Pub. Util. Code Section 2881(d) authorizes the Commission to provide SGDs to individuals with a certified speech disability at no charge.²⁰

6.2. Pub. Util. Code Section 710

Until recently, Pub. Util. Code Section 710 limited the Commission from “exercising regulatory jurisdiction or control” over VoIP and IP-enabled services. This limited California Connect from offering IP- and wireless-based relay services and equipment. However, this statute sunset on January 1, 2020, and no longer applies. Under Pub. Util. Code 710, California Connect was unable to adapt to the changing needs of people who are deaf or have other disabilities, but with this statutory barrier removed, the Needs Assessment Report recommended expanding California Connect services and equipment offerings.

6.2.1. Party Positions

The telecommunication carriers' main concerns centered on whether the Commission has the authority to regulate VoIP and whether the sunset of Pub. Util. Code Section 710 justifies the imposition of public utility regulations on VoIP services.

The Small LECs state that, while they fully support California Connect and have a long history of complying with the program's statutory and regulatory requirements, they are concerned that extending regulatory requirements associated with California Connect to VoIP and IP-enabled services conflicts with the Commission's lack of jurisdiction over such services.²¹ The Small LECs have concerns with the Commission's proposal to potentially extend its regulatory reach beyond regulated, intrastate services. The Small LECs state that the

²⁰ SB 60; AB 136, Stats. 2011, Ch. 404, added Speech Language Pathologists to the list of Program Certifying Agents.

²¹ See opening comments of the Small LECs at 1.

Commission should resolve the fundamental jurisdictional issue of whether the Commission may regulate VoIP or other IP-enabled services before applying California Connect regulations to VoIP and IP-enabled offerings. As of the date of the Small LECs' comments, a decision was pending in the VoIP rulemaking, R.22-08-008.²²

Cox in its comments cautions that any proposal that is beyond the scope of Pub. Util. Code Section 2881 – as well-intended as any given proposal may be – cannot be considered by the Commission. Cox agrees with the Small LECs' concerns that proposals to extend California Connect program regulatory requirements to VoIP and IP-enabled services are not currently within the scope of Pub. Util. Code Section 2881.²³ Cox recommends the Commission ensure that any updates it considers and adopts in this rulemaking are consistent with Pub. Util. Code Section 2881.²⁴

AT&T in its comments agrees with the Small LECs that the potential expansion of regulatory requirements associated with California Connect to VoIP and IP-enabled services could conflict with the Commission's lack of jurisdiction over such services. AT&T supports the Small LECs' call to the Commission to resolve fundamental jurisdictional issues regarding the regulation of VoIP and IP-enabled services before seeking to regulate those services through other rulemaking proceedings such as this.²⁵

²² See opening comments of Small LECs filed 1/9/2024 at 1.

²³ See reply comments of Cox California Telecom, LLC, filed 1/22/2024 at 2.

²⁴ *Ibid.* at 3.

²⁵ See reply comments of AT&T, at 1.

The Joint Commenters disputed the carriers' claims that the Commission does not have regulatory authority over VoIP.²⁶ They state that California law gives the Commission jurisdiction over telephone corporations, including those that use VoIP technology.²⁷ The Joint Commenters state that the Commission has already determined that VoIP providers are "telephone corporations" and their facilities are "telephone lines" within the meaning of the Public Utilities Code. They are therefore subject to the Commission's jurisdiction.²⁸ The parties state that while VoIP providers offer services that have different characteristics than traditional providers, those providers nevertheless "own, operate, control, or manage a line, plant, or system for...the transmission of telephone and telegraph messages" for profit.²⁹

The parties also point out that the sunset of Pub. Util. Code 710 no longer places any potential limitations on the California Connect program's offering of IP-enabled and wireless services and equipment.³⁰ The Joint Commenters claim that the Federal Communications Commission (FCC) has not held that VoIP services are an information service.³¹ They claim that Small LECs rely on an Eighth Circuit decision from 2007, which the Commission has questioned and recognized as non-binding.³²

²⁶ See Staff Proposal at 8.

²⁷ See reply comments for CforAT and TURN, filed 1/22/2024 at 2.

²⁸ *Ibid.* at 2 citing D.19-08-025 at 11-15, affirmed in D.20-09-012.

²⁹ See reply comments for CforAT and TURN, filed 1/22/2024 at 2 citing Cal. Const. Art. XII, § 3.

³⁰ *Ibid.* at 2.

³¹ *Ibid.* at 3.

³² *Ibid.* at 3, citing D.20-09-012 at 24 ("The Commission is not bound by that decision, and the 8th Circuit's reliance on the federal policy of nonregulation of information services as the basis for preempting state regulation of VoIP services is questionable.")

In its comments to the Staff Proposal, the Joint Commenters point out that on November 12, 2024, the Commission issued D.24-11-003, which affirmed VoIP providers' status as telephone corporations and solidified the Commission's jurisdiction over VoIP service.³³

6.2.2. Discussion

The Commission rejects the carriers' claim that VoIP services are outside of the regulatory reach of the Commission, particularly in light of the Commission's issuance of D.24-11-003, which states:

*"[A]s 'telephone corporations,' interconnected VoIP service providers are subject to laws and regulations applicable to other wireline and wireless telephone corporations, unless otherwise exempt by the California Public Utilities Commission (CPUC), state law, or federal law ..."*³⁴

The Commission's jurisdiction over VoIP service differs depending on whether it is a fixed interconnected VoIP service, which can only be used from one location; or a nomadic interconnected VoIP service, which may be used from multiple locations.³⁵ Without exception, the Commission has full authority to regulate fixed interconnected VoIP service and the regulatory obligations applicable to other wireline telephone corporations, including statutorily required market entry conditions.³⁶ However, the FCC preempted states from imposing rate regulation, tariffing, or other requirements that operate as "conditions to entry" for nomadic interconnected VoIP service providers.³⁷ Nevertheless, the FCC did not preempt the Commission from regulating service

³³ D.24-11-003, issued in R.22-08-008 on 11/12/2024 at 15-19.

³⁴ See D.24-11-003 at 19.

³⁵ *Ibid.* at 16; see also *In re Universal Serv. Contribution Methodology* at ¶ 3.

³⁶ *Ibid.* at 21.

³⁷ *Ibid.* at 16

providers in areas such as public safety and consumer protection.³⁸ Therefore, the Commission may evaluate and adopt all forms of equipment and fixed interconnected VoIP services as necessary and appropriate for the administration of California Connect, may regulate nomadic interconnected VoIP services for compliance with public safety and consumer protection components of California Connect, and may serve its subscribers, including through IP-enabled equipment and services that may utilize VoIP.

7. Staff Proposal Recommendations

7.1. Barriers to Enrollment

7.1.1. Disability Certification

For enrollment into California Connect, Pub. Util. Code Section 2881 requires applicants to be evaluated by a licensed medical professional, such as a physician, audiologist, optometrist, a speech and language pathologist, or a representative from a qualifying federal or state agency. This professional or agency staff must then sign the application—physically or electronically—to certify the applicant's disability. This certification process can create barriers to program participation. The need for a physical signature from a licensed provider often necessitates doctor's appointments, upfront payments, transportation expenses, and, in some cases, coordinating specialized medical transport in order to complete the California Connect application.³⁹

The Staff Proposal recommended the removal of the medical professional requirement and allowing Communications Division Staff to develop the eligibility criteria for participants to obtain California Connect equipment and

³⁸ *Ibid.* at 19.

³⁹ See Needs Assessment at 9.

services.⁴⁰ A “Qualified Entity” could be used to help streamline the application process by connecting potential California Connect subscribers with statutorily qualified physicians, audiologists, and speech pathologists, either through partnerships with CBOs or other means. The Commission could also develop guidelines for which entities can be considered a Qualified Entity as it relates to providing documentation to verify disabilities.

7.1.2. Party Positions

CCASDHH recommends allowing applicants to be certified by deaf nonprofit social services organizations. This would provide additional options for deaf participants who do not have access to audiologists and are not consumers of the Department of Rehabilitation.⁴¹

The Joint Commenters state that even for those aware of the program, the current certification requirement is a major barrier to accessing California Connect.⁴² They state that, assuming an applicant is established with an appropriate healthcare agency, obtaining certification may entail additional appointments, copays, missed time from work or school, logistical challenges, and transportation costs. There may also be fee for the healthcare provider to fill out the paperwork.⁴³

Another problem the Joint Commenters mention with the current certification requirement is that it reflects a model of disability known as the “medical model,” centered on a belief that a disability is a condition for medical

⁴⁰ See Staff Proposal at 3.

⁴¹ See Opening Comments of California Coalition of Agencies Serving the Deaf and Hard of Hearing, Filed 1/9/2024, at 2-3.

⁴² See Opening Comments of CforAT and TURN, filed 1/9/2024 at 5.

⁴³ See Opening Comments of CforAT and TURN, filed 1/9/2024 at 6.

professionals to diagnose and manage. There is strong support in the disability community for an “independent living model,” which holds that people with disabilities should be autonomous decisionmakers about their own lives as they understand their own needs.⁴⁴ The Joint Commenters cite the Needs Assessment recommendation to change the certification requirement to allow alternative methods of certification, such as having California Connect assess applicants or accepting referrals from government agencies.⁴⁵

7.1.3. Discussion

The Commission agrees that the medical certification requirement can be burdensome, may discourage potential California Connect applicants, and relies on a “medical model” view of disabilities where an “independent living model” may be more appropriate. However, the removal of the medical professional certification requirement necessitates a change to Pub. Util. Code Section 2881 and cannot be modified through a Commission decision.

Therefore, the Communications Division should coordinate with the Commission’s Office of Governmental Affairs (OGA) to discuss potential modifications to the certification language in Pub. Util. Code 2881 to allow for alternatives methods of certification.

At the same time, the Communications Division should explore the option of bringing on Qualified Entities to assist with the enrollment and application process. This includes developing guidelines, in consultation with appropriate parties, for designating a “Qualified Entity” as it relates to providing documentation verifying disabilities. The guidelines should conform to the

⁴⁴ *Id.*

⁴⁵ *Ibid.*

current requirements or any future amended requirements of Pub. Util. Code Section 2881.

7.2. Application Process

The complexity of the program's application process was another barrier identified in the Needs Assessment. The Needs Assessment revealed that approximately ten percent of individuals surveyed found the program's application process to be an obstacle. Some survey respondents felt that completing the application was difficult and required assistance, and some indicated that they did not apply because it was too overwhelming.⁴⁶

The Staff Proposal recommended consolidation of all application versions into a single streamlined form and incorporating helpful resources and assistance tools to guide applicants.⁴⁷ The Staff Proposal also proposed including accessible tutorial features with audio and video instructions to assist users in completing the form.⁴⁸ The Communications Division envisions a transition from a hardcopy to electronic version of the California Connect application and recommends the paper-based form to remain in use temporarily. The Communications Division states that it will seek input from the disability community, TADDAC, the EPAC members, and consumers to finalize improvements and ensure the application is as user-friendly and accessible as possible.⁴⁹ The Staff Proposal states that simplifying the process removes a critical barrier to access, particularly for low-

⁴⁶ See Needs Assessment at 11.

⁴⁷ See Staff Proposal at 23.

⁴⁸ See Staff Proposal at 23.

⁴⁹ *Ibid.* at 23-24.

income and historically underserved groups, and is an essential step toward improving equity in transportation access.⁵⁰

7.2.1. Party Positions

Cal Advocates recommends simplifying the application process by requiring only essential information, such as personal information, disability information, income, and household information, shortening text-heavy sections, and correcting difficult-to-navigate sections.⁵¹

The Joint Commenters support the online application option but recommend also maintaining a paper application option for people who need it.⁵² The Joint Commenters explain that there are multiple reasons someone may be unable to apply online, including lack of reliable internet access, lack of digital skills, or lack of access to the same IP-based accessible equipment proposed to be offered in the Staff Proposal.⁵³ The Joint Commenters also recommend that all versions of the application forms ask the same information.⁵⁴

7.2.2. Discussion

In response to this barrier, the Communications Division has since refined and simplified the application process by reducing the verbiage and number of application fields, making it easier for individuals to understand and complete the form. Also, in March 2024, an online version of the application was launched, allowing medical professionals to receive and certify forms electronically, eliminating the need for in-person visits and reducing the burden on applicants.

⁵⁰ See Staff Proposal at 23.

⁵¹ See reply comments of Cal Advocates filed 1/22/2024 at 2.

⁵² See Comments of CforAT and TURN filed 6/6/2025 at 2-3.

⁵³ See Comments of CforAT and TURN filed 6/6/2025 at 3.

⁵⁴ See Comments from TURN and CforAT filed 10/11/2024 at 3.

Previously, the form was only available in paper format, requiring applicants to physically submit the application to a medical professional for signature and disability certification.⁵⁵

The Commission agrees with the Communications Division's work performed thus far to create an online version of the application. The Commission encourages the Communications Division to make continued improvements as needed and appropriate to ease the application process. The Commission also agrees with the Joint Commenters that a paper version of the application should be retained. As the Joint Commenters pointed out, there could be various reasons why an otherwise potential California Connect applicant might not be able to access or utilize an online application process. Therefore, a hardcopy application option should still be offered, and both the online and paper application should request the same information to the greatest extent possible.

7.3. Program Consolidation and Branding

Until recently, California Connect encompassed three different programs, each with different application processes. These programs included: 1) EDP, which provides telecommunication equipment; 2) CRS, which includes four different types of relay services (TRS, STS, Caption Telephone Services, and Remote Conference Captioning); and 3) AAC that includes SGD funding and the Voice Options Program, which offer tablets with speech applications.⁵⁶

Historically, these programs were marketed separately or not promoted effectively. For instance, EDP operated under CTAP, while California Phones

⁵⁵ See Staff Proposal at 23.

⁵⁶ See Staff Proposal at 20.

and CRS were standalone brands with no direct connection to California Connect. The EDP and AAC programs also had separate application processes and eligibility determinations, further complicating consumer access.⁵⁷

The Needs Assessment Report states that many potential program participants were unfamiliar with the California Connect program or its associated branding. Among those aware of the program, there was confusion over the fragmented structure of subprograms, distinct brand names, and differing application processes.⁵⁸

The Staff Proposal recommended consolidating all subprograms under the unified “California Connect” brand and implementing a simplified, single-application process.⁵⁹

7.3.1. Party Position

The Joint Commenters note that the administration of current DDTP programs is fragmented – for example, the Voice Options Program is administered by the California Department of Rehabilitation, not California Connect itself. Among other issues, they note that this fragmentation makes the application process more confusing, as there are currently three different applications, and the separate programs have separate sets of rules.⁶⁰ However, they make no specific recommendations to address this barrier.

7.3.2. Discussion

The Commission supports consolidating the EDP, the Voice Options Program, and AAC under the unified “California Connect” brand, and

⁵⁷ *Id.*

⁵⁸ See Staff Proposal at 19.

⁵⁹ See Staff Proposal at 4.

⁶⁰ See Opening Comments of TURN and CforAT filed 1/9/2024 at 11.

implementing a single-application process. The Communications Division has already begun consolidating these subprograms to improve accessibility, reduce confusion, and enhance program visibility.

7.4. Community Outreach and Partnerships

The Needs Assessment Report discussed the importance of partnering with CBOs to expand awareness, education, and assistance with California Connect. CBOs are often perceived by the disability community as a trusted resource and are thus well-positioned to promote and serve as a supporting arm of California Connect. As such, inroads into community outreach and partnerships with CBOs could benefit prospective and existing California Connect participants.

The Staff Proposal recommended expanding partnerships with state, federal, and local community entities that provide social services, independent living, developmental, academic, and housing resources that support people with disabilities. It recommended issuing strategic grants to CBOs to assist in outreach and the distribution of California Connect equipment to the consumers they directly serve. Outreach entities include income-based assistance programs, such as financial assistance, healthcare, food, and transportation programs, ensuring that eligible individuals also receive telecommunication and communication support they need from California Connect. Collaboration with CBOs will improve the program's visibility, particularly in underserved, rural, and unserved tribal communities.⁶¹

⁶¹ See Staff Proposal at 4.

7.4.1. Party Positions

NDC asserts there is a need to enhance education and outreach of California Connect. The efforts need to be focused, localized, and grass roots.⁶² NDC recommends that the Commission provide resources to community-based groups, such as NDC, for the purpose of promoting California Connect.⁶³

Cal Advocates recommends that the Commission partner with CBOs, California Communications Access Foundation (CCAF), and other disability focused organizations in rural/underserved communities who may assist in completing and certifying applications at no cost to the applicant as provided in other states. Cal Advocates agrees with NDC that collaboration with CBOs will increase localized awareness of California Connect.⁶⁴

The Joint Commenters support Cal Advocates' recommendation to engage in partnerships with CBOs that serve people with disabilities in rural areas to more immediately address deficiencies and improve program access.⁶⁵ The Joint Commenters point out that many CBOs have built relationships with the deaf and disability communities and have on-the-ground knowledge that others may not have.⁶⁶ They recommend that the Commission consider enhancing potential partnerships with CBOs.⁶⁷

The Joint Commenters advise that in order to effectively engage CBOs in a partnership process, it is crucial that the program provide appropriate resources,

⁶² See opening comments of NDC filed 1/9/2024 at 4.

⁶³ *Id.*

⁶⁴ See reply comments of Cal Advocates filed 1/22/2024 at 3.

⁶⁵ See reply comments of CforAT and TURN filed 1/22/2024 at 6.

⁶⁶ *Id.*

⁶⁷ See comments of CforAT and TURN filed 10/11/2024 at 13.

including direct compensation, for the work it is requesting.⁶⁸ The Joint Commenters agree with the Staff Proposal that many CBOs have limited financial resources and space, which limits their ability to expand the scope of their work to include enrollment assistance and support the funding for CBOs via grants.⁶⁹ However, they caution that grant funding must be sufficient to motivate CBOs to participate. CBOs are often offered a grant period of no more than a year, which discourages participation. CBOs are hesitant to create a program with a short one-year duration without promise of future funding because of the resources establishing that program would consume. Additionally, if the program terminates after one year, the populations served by that program could feel abandoned and lose trust in the CBO. Accordingly, any grant funding should be sufficient for CBOs to work with the Commission on a longer-term basis.⁷⁰

The Joint Commenters also note, using the California Alternate Rates for Energy (CARE) and the Family Electric Rate Assistance (FERA) programs as examples, that the Commission's existing compensation programs may reimburse organizations assisting in program enrollment on a per-enrollee basis.⁷¹ The Joint Commenters caution that this type of compensation model does not account for the actual time spent enrolling a customer.⁷² They contend that a per-enrollee reimbursement model creates an incentive for CBOs to seek out easily enrolled participants and turn away more complicated enrollments.

⁶⁸ *Id.*

⁶⁹ See comments of CforAT and TURN filed 6/6/2025 at 5.

⁷⁰ *Id.*

⁷¹ See comments of CforAT and TURN filed 10/11/2024 at 13.

⁷² *Id.*

Instead, California Connect partnerships with CBOs should provide compensation that reflect the CBO's actual operating costs, based on the CBOs' efforts and acknowledge that outreach takes time to become effective.⁷³

7.4.2. Discussion

The Commission agrees that the program should consider partnerships with state, federal, and local community entities and CBOs that provide social services, independent living, developmental, academic, and/or housing resources that support people with disabilities. The Communications Division should work with CBOs as appropriate to promote California Connect, educate both eligible participants and people already enrolled, and provide assistance as needed. We also agree that some sort of compensation structure should be considered for CBOs that assist in outreach and participant enrollment. However, we do not believe that it is necessary to develop a new compensation model for California Connect, as the Commission is already evaluating similar compensation structures in other programs and have existing compensation models for CBOs in place. We should look to those efforts for guidance rather than considering a third and separate model. Gathering data from those programs will allow us to assess whether they are a good model for California Connect.

In the California Lifeline program, similar barriers exist. In D.25-10-033, the Commission wanted to ensure that sufficient assistance was provided to Lifeline participants, so it directed the Communications Division to develop a proposal for a “trusted partner framework” that would address the following: 1) a definition of a trusted partner; 2) review, approval, and renewal process for

⁷³ *Ibid.* at 14.

trusted partners; 3) a description of the authority and process trusted partners will have to enroll applicants; 4) a description of any materials and training trusted partners may receive; 5) a description of any new technology or other services the California LifeLine program and applicants may need to work with trusted partners; 6) any funding information; and 7) a description of how trusted partners will interact with service providers and the third party administrator.⁷⁴ Communications Division was instructed to gather feedback on this proposal through a workshop and/or comments, which would then be examined in the successor Lifeline rulemaking, R.25-11-005. Also, the Commission's CARE program has an existing compensation program that reimburses CBOs for program enrollment on a per-enrollee basis.

Although Lifeline and CARE are not set up in the exact same manner as California Connect, many similarities exist between the three programs in terms of their outreach and enrollment barriers, and their need to better coordinate with CBOs and other partners. Therefore, we should look to those efforts for guidance and determine if any of those two would be a good model for California Connect. The Communications Division shall monitor the development of the trusted partner proposal in the Lifeline proceeding, compare it to the CBO compensation structure in the CARE program, and then propose a path forward for partnering with CBOs in California Connect. Other considerations should include the following:

- Guidance and resources for a CBO to stand up and operate a California Connect assistance program.
- A compensation model taking into account the type and volume of work based on the potential trusted partner

⁷⁴ D.25-10-033 at 16-18.

proposal in Lifeline and the CBO compensation program in CARE.

- Metrics to evaluate the effectiveness of the partnership.
- Considerations for long-term program and CBO needs.
- Safeguards to protect the investment placed with the CBOs to ensure accountability of public funds.

Any final compensation structure approved for California Connect shall align with existing and approved compensation structures for similar Commission authorized assistance programs where it makes sense, such as CARE and Lifeline.

7.5. Collaboration with Assistance Programs

According to a compendium produced by the Center for Research on Disability, corroborated by the Needs Assessment Report, individuals within the disability community are disproportionately low-income relative to their non-disabled counterparts. Specifically, nearly one-quarter (22.5%) of persons with disabilities in California are living in poverty, in contrast to 10% of those without disabilities.⁷⁵ People who are deaf receive Supplemental Security Income (SSI) benefits at different rates across the nation.⁷⁶ As a result, there is a strong possibility that many individuals with disabilities could benefit from a variety of local, federal, and state assistance programs beyond California Connect.

⁷⁵ <https://www.researchondisability.org/sites/default/files/media/2024-07-2024-compendium-final/pdf>

⁷⁶ Bloom, C.L., Palmer, J.L., & Winninghoff, J. (2024). Postsecondary Achievement of Deaf People in California: 2019-2023. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. Retrieved from https://dashboard.nationaldeafcenter.org/static/media/NDC_California_report.72852e81110540f612c2.pdf

California Connect can play a crucial role in raising awareness about those programs and vice versa.⁷⁷

The Staff Proposal points out that the LifeLine program lends itself to a partnership with California Connect. The LifeLine program offers reduced phone service rates for eligible low-income families in California.⁷⁸ The Staff Proposal says that by the end of 2027, California Connect contractor staff aim to expand the use of its online application, social media platforms, and future digital portal to promote dual enrollment, education, and training opportunities for both LifeLine and California Connect consumers. Further, LifeLine awareness could be amplified through California Connect's website, social media, service centers, outreach activities, and marketing campaigns.⁷⁹

In addition, by the end of 2027, California Connect contractor staff will enhance cross-promotion of other related programs such as ICanConnect,⁸⁰ based on income and/or disability criteria. Disability community providers throughout California who provide direct disability services could inform applicants about California Connect. Additionally, disability-related social service, education, and community programs could feature California Connect details on their homepages with direct links to California Connect.⁸¹

The Staff Proposal also recommended expanding the program's annual Outreach and Marketing plans to develop partnerships with federal and State

⁷⁷ See Staff Proposal at 24.

⁷⁸ See Staff Proposal at 25.

⁷⁹ *Id.*

⁸⁰ <https://www.icanconnect.org/>

⁸¹ See Staff Proposal at 25-26.

income-based public purpose programs, such as CalFresh, Supplemental Nutrition Assistance Program (SNAP), and Medicaid, as well as other local assistance programs. Through these marketing and outreach collaborations, individuals with disabilities could access a broader support spectrum, ultimately improving their quality of life.

7.5.1. Party Positions

The Joint Commenters recommend that the Commission explore ways to leverage other programs to increase awareness of California Connect.⁸² They recommend that the Commission conduct education and outreach about potential state and federal financial assistance programs and engage stakeholders in the disability community about how California Connect might assess and determine financial assistance.⁸³ The Joint Commenters see this proceeding as a crucial opportunity to better align California Connect with other consumer programs, particularly LifeLine.

Some participants in the Needs Assessment survey discussed difficulties in affording phone service, and others were unaware of LifeLine.⁸⁴ The Joint Commenters claim the 2022 California LifeLine Program Assessment presents additional findings that TTY users are under-utilizing LifeLine, and that LifeLine-eligible individuals with other disabilities may be as well.⁸⁵

The Joint Commenters advise promoting LifeLine during the California Connect application process. Applicants can be made aware that a program exists that helps people afford basic phone service without prompting an

⁸² See opening comments of CforAT and TURN filed 1/9/2024 at 9

⁸³ See reply comments of CforAT and TURN filed 1/22/2024 at 3.

⁸⁴ See opening comments for CforAT and TURN at 8, citing the Needs Assessment at 19-20.

⁸⁵ *Ibid.* at 8-9.

applicant to disclose their income level. Subsequent communications from California Connect can also promote Lifeline. They point out that the California Connect website already advertises the LifeLine program on its homepage with a banner. The LifeLine website should similarly promote California Connect on its home page, creating cross-promotion across the programs.⁸⁶

The Joint Commenters state there is also a potential overlap between California Connect and certain energy programs, including Medical Baseline or the backup battery distribution programs that energy utilities offer in High Fire Threat Districts (HFTD). California Connect and Medical Baseline both cover individuals with some mobility disabilities, also presenting the possibility for cross-promotion across these programs.

As part of de-energization guidelines adopted in R.18-12-005, the Commission currently requires electric utilities to identify households that include a person with a disability, which includes households enrolled in Medical Baseline. The Commission could require targeted promotion of California Connect to these identified customers through paper mailings, e-mails, and bill inserts.⁸⁷ The three large California electric utilities each have web pages dedicated to their Medical Baseline programs. The Commission could require them to promote California Connect and link to the California Connect website on these pages.⁸⁸

Cal Advocates agree with the Joint Commenters that the Commission should align California Connect with other customer programs to leverage and increase awareness of California Connect. Collaborative efforts, such as

⁸⁶ *Ibid.* at 15.

⁸⁷ *Ibid.* at 16.

⁸⁸ *Ibid.* at 17.

including a link to the California Connect website on other consumer program websites or including information on California Connect in printed informational materials of other programs, would enhance program awareness and visibility.⁸⁹

7.5.2. Discussion

The Commission agrees with the recommendations provided by parties and the Staff Proposal to leverage other programs such as Lifeline, Medical Baseline, and other programs. Closer coordination and cross promotion of California Connect with other programs, and vice-versa will serve to better educate and promote these programs to potential applicants. California Connect staff should work with these programs as appropriate to promote each other's programs in their informational and educational materials.

7.6. Emergency Response Integration

People with disabilities face disproportionate impacts from disasters compared to people without disabilities. Following a disaster, individuals with disabilities face greater rates of unsanitary conditions, isolation, scam calls, and remain displaced by the disaster than people without a disability.⁹⁰

The Staff Proposal recommended that emergency response efforts be strengthened through partnerships with disaster relief agencies, ensuring California Connect services and equipment are available in evacuation centers during emergencies.⁹¹ The Staff Proposal states that Californians with hearing or vision disabilities experience disproportionately higher impacts during disasters—97% reported isolation and exposure to scams, and 86.7% faced unsanitary conditions, compared to 32.8% of those without disabilities. By

⁸⁹ See reply comments of Cal Advocates filed 1/22/2024 at 3.

⁹⁰ See comments of Cal Advocates filed 10/11/2024 at 2.

⁹¹ See Staff Proposal at 3.

collaborating with disaster relief agencies and deploying mobile service units to shelters and evacuation sites, individuals with disabilities will have timely access to communication tools, support, and critical information during emergencies. Beyond providing equipment, California Connect contractor staff can assess the infrastructure of evacuation facilities to determine whether they can support landline, IP, or wireless communication devices.

However, the Staff Proposal highlights several challenges that limit the California Connect program's ability to provide comprehensive support in these scenarios. One major issue is coordinating efforts with other government agencies, as each disaster presents unique logistics. For example, responding to a flood requires a different approach than responding to an earthquake.

The Staff Proposal states there is often a lack of awareness among emergency response agencies that California Connect can be a resource for evaluation center staff, case workers, or emergency services personnel working in the field. This underscores the importance of educating government agencies about the program's capabilities in emergency response.⁹²

To address this, the Communications Division has presented to the California Office of Emergency Services (CalOES) Access and Functional Needs (AFN) Statewide Community Advisory Committee information on how the California Connect program can help displaced people with disabilities at evacuation centers. Similar outreach is ongoing with other government agencies handling natural disasters.

Additionally, the Communications Division and California Connect contractor personnel propose to coordinate quarterly meetings with CalOES to

⁹² *Ibid.* at 18.

provide program updates, demonstrate services and equipment, and deliver training on the use of the evaluation toolkit. These meetings will support CalOES training staff, as well as federal, state, and local emergency management and disaster response teams. This collaboration is intended to enhance the ability of CalOES to deliver inclusive and effective emergency response services throughout California.

7.6.1. Party Positions

Cal Advocates describes wireless emergency alert as a crucial channel for emergency information, but the system has limitations for many people with disabilities, particularly those with vision or hearing impairments, or for those situated away from their devices.⁹³ Cal Advocates states that the FCC suggests utilizing wireline-based communication as an alternative means of communication to minimize network congestion during emergencies.⁹⁴ Cal Advocates advises the Commission to encourage California Connect to collaborate with emergency evacuation shelters to ensure they possess landline jacks for specialized communication equipment like a captioned phone, TTY, and land service that can be used with the CRS. Cal Advocates also recommends emergency shelters be equipped with assistive devices to accommodate people with disabilities.⁹⁵

If an evacuation center is not near a California Connect service center, Cal Advocates recommends deployment of mobile service centers to ensure people with disabilities have uninterrupted access to services and equipment

⁹³ See opening comments of Cal Advocates filed 1/9/2025 at 5.

⁹⁴ *Id.*

⁹⁵ *Ibid.* at 5-6.

during emergencies.⁹⁶ Cal Advocates states that with sufficient resources, California Connect can support people with disabilities during a natural disaster or an emergency evacuation in several ways. These efforts include deploying California Connect contractor staff to evacuation centers or temporary shelters to supply, set up, and train individuals using specialized devices and offering referrals to other needed services.

Cal Advocates also recommends the Commission require CTAP service centers to maintain readily available inventories of essential communication equipment tailored to meet the specific needs of the disability community in each county. CTAP service center staff should be equipped with both essential communication equipment and emergency training. This will allow more people with disabilities to stay informed, connected, and empowered to navigate emergencies effectively.⁹⁷

Cal Advocates recommends the Commission establish mobile units in counties that are prone to disasters, particularly in rural areas in Tier 2 HFTDs.⁹⁸ These mobile units would be available to quickly respond to emergencies due to natural disasters and should also be available during non-disaster emergency situations.⁹⁹ Cal Advocates says CalOES states that individuals with AFN are disproportionately affected by disasters.¹⁰⁰ As people in disaster areas evacuate, people with disabilities may not have the ability to bring the special equipment they use to communicate with others. Not having access to this equipment

⁹⁶ See comments of Cal Advocates filed 10/11/2024 at 3,6, and 7.

⁹⁷ See opening comments of Cal Advocates filed 1/9/2025 at 6.

⁹⁸ See comments of Cal Advocates, filed 10/11/2024 at 4.

⁹⁹ See comments of Cal Advocates, filed 10/11/2024 at 1.

¹⁰⁰ *Id.*

impedes their ability to contact loved ones outside an evacuation shelter, and their ability to understand updates at an evacuation shelter.¹⁰¹

Cal Advocates also recommends the Commission require service providers to implement repeating crucial alerts every few minutes with distinct vibration patterns while simultaneously sending text messages in large format. They additionally recommend text-to-speech functionality compatible with accessibility devices.¹⁰²

CCASDHH recommends collaboration with CalOES. They state the threats of fire, flood, and viral pandemic in recent years have underscored the need for access to receiving emergency warnings and alerts. CCASDHH agencies have advocated that emergency coordination, shelters and disaster recovery services need to be accessible to deaf people and people with disabilities.¹⁰³ These service centers are not equally distributed around California and may not be available to many people with disabilities after a disaster.¹⁰⁴ Mobile units offer a flexible approach for expanding needed service to areas affected by disasters, or regions with limited access to permanent centers, such as rural communities.¹⁰⁵

The Joint Commenters point out that preparedness for emergencies in the California Connect program is relevant given the ongoing national transition to Next Generation 911.¹⁰⁶ They advise that all California Connect equipment and

¹⁰¹ *Id.*

¹⁰² See opening comments of Cal Advocates filed 1/9/2025 at 6.

¹⁰³ *Ibid.* at 4.

¹⁰⁴ See comments of Cal Advocates, filed 10/11/2024 at 3.

¹⁰⁵ See comments of Cal Advocates, filed 10/11/2024 at 3-4.

¹⁰⁶ See, e.g., CA 911 Technology, California Governor's Office of Emergency Services, available at <https://www.caloes.ca.gov/office-of-the-director/operations/logistics-management/public-safetycommunications/> ca-9-1-1-emergency-communications-branch/ca-911-technology/ (last

Footnote continued on next page.

service offerings need to be compatible with Next Generation 911.¹⁰⁷ The Joint Commenters recommend the Commission adopt Cal Advocates and CCASDH's recommendations regarding accessible emergency communications.¹⁰⁸

7.6.2. Discussion

The Commission agrees with the parties and the Staff Proposal about the need for California Connect collaboration with emergency response agencies at all levels. Particularly important is coordination with CalOES to ensure California Connect consumers have access to the equipment and services they need to communicate with emergency responders, receive instruction and updates, and communicate with family and friends.

California Connect should work continuously with CalOES and local emergency response agencies to identify needs of people with disabilities in emergency situations and locales. Specifically, California Connect should ensure the following:

- Ensure that emergency shelters are equipped with assistive devices to accommodate people with disabilities.
 - Collaborate with emergency evacuation shelters to ensure they possess landline jacks for specialized communication equipment.
 - Deploy California Connect contractor staff to evacuation centers or temporary shelters to supply, set up, and train individuals using specialized devices and offer referrals to other needed services.

accessed Dec. 7, 2023); *Next Generation 911*, National 911 Program (last updated June 9, 2023), available at <https://www.911.gov/issues/ng911/>.

¹⁰⁷ See Opening Comments of CforAT and TURN filed 1/9/2025 at 4.

¹⁰⁸ See reply comments of CforAT and TURN filed 1/22/2025 at 7.

- Equip CTAP service center staff with both essential communication equipment and emergency training.
- Deploy mobile service centers as needed to ensure people with disabilities have uninterrupted access to services and equipment during emergencies, particularly in areas that are prone to disasters, particularly in rural areas in Tier 2 and 3 High Fire Threat Districts.
- Require CTAP service centers to maintain readily available inventories of essential communication equipment tailored to meet the specific needs of the disability community in the region.
- Require all California Connect equipment and service offerings to be compatible with Next Generation 911.
- Require equipment and service offerings to offer text-to-speech functionality compatible with accessibility devices
- Require service providers to implement repeating crucial alerts every few minutes with distinct vibration patterns while simultaneously sending text messages in large format.

The Communication Division is encouraged to continue collaboration with CalOES and other appropriate agencies to ensure the needs of the deaf and disability communities are met in times of an emergency.

7.7. Equipment, Services, and Technology Upgrades

The EDP component of California Connect currently offers several assistive technologies and accessories compatible with mobile phones, including cell phone amplifiers.¹⁰⁹ However, as highlighted in the Needs Assessment, “the program has not evolved with the times and relies on outdated technologies that

¹⁰⁹ See Staff Proposal at 3.

do not address the growing needs of the deaf and disabled community.”¹¹⁰ Also, with the transition to VoIP, which included infrastructure changes from copper lines to wireless connections and fiber networks, there have been impacts to TTYS, which resulted in call drop-offs and garbling.¹¹¹

To modernize the program, the Staff Proposal recommended providing primary IP-enabled and wireless communication devices and services and equipment, including tablets, telephones, smartphones, and mobile Wi-Fi devices.¹¹² IP and wireless-based services include customer assessment of IP and wireless communication needs, installation, and technical support of IP and wireless equipment and services. This would also involve providing an individualized selection of assistive technologies and accessories to meet individual needs, such as braille readers, smart devices, and Bluetooth-supported devices. These services can be provided in person, remotely, or virtually.¹¹³ The Staff Proposal also recommended that the Communications Division continue to work with EPAC to identify and test non-landline-based equipment and services, as well as with TADDAC to evaluate the adoption of equipment and services into the program.¹¹⁴

Since the initiation of this proceeding, Communications Division and California Connect contractor staff have introduced IP-enabled wireless devices, emergency equipment, backup batteries, and service offerings from other states to the EPAC to broaden the scope of provided devices and services. The newly

¹¹⁰ *Ibid.* at 11, citing the Needs Assessment at 4.

¹¹¹ See Needs Assessment at 4.

¹¹² See Staff Proposal at 3.

¹¹³ See Staff Proposal at 3.

¹¹⁴ See Needs Assessment Report, at 11.

introduced devices include backup power devices, disaster, weather, and emergency alert devices, as well as home pods and a home alert system that connect using Bluetooth or directly to a smart device. Communications Division Staff continue to recommend new and emerging communication devices and accessories, and IP and wireless based services, including video remote interpreting, and Real Time Text for EPAC's review. Once EPAC reviews the proposed equipment, services, and assistive technologies, it will determine their potential benefits for people with disabilities and, if deemed appropriate, will forward its recommendations to TADDAC for approval.¹¹⁵

7.7.1. Party Positions

CCASDHH recommends expanding California Connect equipment to include IP-enabled devices and services including smartphones. CASDHH goes on to say that telephone access should not be limited to the home. In today's world, people have telecommunication access outside of their home and on the go, and use that access for calling, texting, and video conferencing. Additionally, CCASDHH says that having access to smartphones plays a crucial role in emergencies for receiving wireless emergency alerts and using text-to-9-1-1, now available in California as required by law.¹¹⁶ For deaf individuals, the only option for connecting directly to 9-1-1 without relay is through text-to-9-1-1. Additionally, for hearing aid users, smartphones are compatible with hearing aids utilizing Apple MFi or Bluetooth technology.¹¹⁷

¹¹⁵ See Staff Proposal at 12.

¹¹⁶ California Government Code Section 53112.

¹¹⁷ See opening comments of CCASDHH filed 1/9/2024, at 3-4.

NDC says that the deployment of DDTP capable devices to all persons is a critical enabler to removing barriers to social integration.¹¹⁸ NDC recommends that the Commission require that artificial intelligence (AI) software applications that facilitate American Sign Language (ASL) translation be embedded into personal devices, including smartphones and computers. NDC cites the current existence of such technology, including technology capable of listening to spoken language and delivering messages as text or via a video avatar displaying ASL.¹¹⁹

NDC also recommends that regulated entities should be required to reserve bandwidth and computing capacity within communications provider networks to support real-time connected devices to perform AI interpretation and translation functions that are beyond the computing capacity of the user's endpoint device.¹²⁰

NDC additionally recommends that the Commission perform a cost-benefit analysis of the CRS to assess the continued use or phase planning for systems such as the human interpreter-based Video Relay Service (VRS) and the TTY terminal service. VRS involves the use of a human interpreter interceding in three-party communication via webcam or specialized video link and relays the conversation back and forth between the parties.¹²¹

Cal Advocates and CCASDH emphasize "[t]he Commission should modify the DDTP's scope to reflect technological progress, including new types of communications services, such as wireless devices and voice over internet protocol (VoIP) services..." and further recommend expanding California

¹¹⁸ See opening comments of NDC, filed 1/9/2024, at 2.

¹¹⁹ *Id.*

¹²⁰ See opening comments of NDC, filed 1/9/2024, at 2.

¹²¹ *Ibid.* at 3.

Connect equipment to include IP-enabled devices and services, including smartphones.¹²² ¹²³ “Other states, like Colorado, offer IP-enabled devices in their programs. Additionally, the growing number of households with cell phones substantiates the need to update California Connect equipment and service offerings.”¹²⁴

The Joint Commenters support a reassessment of California Connect service and equipment offerings and the inclusion of more modern telecommunications technologies.¹²⁵ The Joint Commenters state that service providers, device manufacturers, and application software developers often fail to devote significant time or resources to accessible or assistive features and services because they do not perceive the potential market as large enough to justify the investment or prioritization over other products.¹²⁶

The Joint Commenters caution that as technology advances, it develops greater capacity and reliance on user data.¹²⁷ They claim that privacy protections are particularly important for people with disabilities when they use assistive technology, as user data collected in this context can contain personal or quasi-medical information.¹²⁸ The Joint Commenters caution that people with disabilities should not have to choose between their privacy and the ability to communicate or participate in society. They recommend that the Commission

¹²² See opening comments of Cal Advocates on R.23-11-001 at 2.

¹²³ See comments of CCASDH filed 1/9/2024, at 3.

¹²⁴ See Staff Proposal at 11.

¹²⁵ See opening comments of CforAT and TURN, filed 1/9/2024 at 4.

¹²⁶ See comments of CforAT and TURN, filed 10/11/2024 at 17.

¹²⁷ *Ibid.* at 18.

¹²⁸ *Ibid.* at 18-19.

ensure that all California Connect equipment and services comply with the California Privacy Rights Act and the Commission specify that DDTP providers cannot collect data about a participant's disability without that person's opt-in consent.¹²⁹

The Joint Commenters also oppose the proposition of replacing the CRS human interpreters with AI.¹³⁰ The services provided in CRS require a third party to correctly receive and relay spoken language. Relay service communications assistants receive specialized training and are able to recognize nuances like tone that existing technology cannot.¹³¹ AI's functionality depends on the data used to train it. Biased training data will produce a biased AI, even if that is not the intent of its creators.¹³² A voice recognition AI that is trained primarily with voice samples from native speakers of Standard American English would tend to transcribe other native speakers of Standard American English correctly but struggle with accents, dialects, or slang associated with a particular region or social group.¹³³ Existing voice recognition AI has documented problems with correctly transcribing certain people's speech, particularly people who speak non-standard dialects or who speak with an accent.¹³⁴ The Joint Commenters claim there is immense potential for AI to produce discriminatory results – and worse user experiences, based on race,

¹²⁹ *Ibid.* at 19.

¹³⁰ *Id.*

¹³¹ *Ibid.* at 19-20.

¹³² See comments of CforAT and TURN, filed 10/11/2024 at 20, citing James Manyika et al., What Do We Do About the Biases of AI?, Harvard Business Review (Oct. 25, 2019), available at <https://hbr.org/2019/10/what-do-we-do-about-the-biases-in-ai>.

¹³³ *Ibid.* 4 at 20.

¹³⁴ *Id.*

ethnicity, or national origin and the Commission should not contemplate introducing AI to the CRS.¹³⁵

7.7.2. Discussion

The Commission agrees with the Staff Proposal and the parties that equipment offerings need to be updated to support modern telecommunications technologies and practices. Providing primary IP-enabled and wireless communication devices including tablets, smartphones, and mobile Wi-Fi devices, as well as installation and technical support for such devices would help bring California Connect more current with modern technology and customer needs and expectations. There also needs to be considerations for the protection of customer data and privacy. The Commission does not agree that CRS human interpreters should be replaced with AI. The Commission agrees with the Joint Commenters that AI technology may produce discriminatory results.

The Communications Division should continue to work with EPAC and TADDAC to identify and test non-landline-based equipment and services and evaluate the adoption of equipment and services into the program. Once EPAC reviews the proposed equipment, services, and assistive technologies, it will determine their potential benefits for people with disabilities and, if deemed appropriate, will forward its recommendations to TADDAC for approval. The Communications Division should also continue to work with California Connect contractor staff to identify and evaluate new technologies as useful and appropriate to California Connect and its participants.

¹³⁵ *Ibid.* at 21.

7.8. Procurement and Distribution

An essential component of modernizing California Connect is improving equipment, service procurement, and distribution processes. Currently, when consumers request specific equipment, their choices are limited to what is available in the warehouse, restricting the program's ability to meet their communication needs. This model has led to many potential program participants being turned away because their required or desired equipment is unavailable in the warehouse inventory. As the program is currently structured, devices cannot be procured based on the unique communication needs of individuals with disabilities.¹³⁶

The Staff Proposal recommended implementation of a direct procurement and shipping model.¹³⁷ Direct procurement and shipping are found to be more individualized and effective than the inventory-based shipping structure, which is the program's current approach.¹³⁸ Adopting the direct procurement and shipping model would eliminate warehouse storage costs, allowing consumers to receive their equipment more quickly.¹³⁹

The Staff Proposal also considered the option of distributing vouchers, where consumers are offered a coupon to purchase full or partial equipment.¹⁴⁰ Some other states have implemented this concept. According to preliminary research, 17 percent and 12 percent of other state EDPs have adopted ownership

¹³⁶ See Staff Proposal at 12.

¹³⁷ *Id.*

¹³⁸ Gallego, G., & Simchi-Levi, D. (1990). On the effectiveness of direct shipping strategy for the one-warehouse multi-retailer R-systems. *Management Science*, 36(2), 240-243.

¹³⁹ See Staff Proposal at 12-13.

¹⁴⁰ *Ibid.* at 13.

and voucher models, respectively.¹⁴¹ In this model, devices are provided directly to participants and become their property, eliminating the need to maintain inventory. While the voucher model offers flexibility, it raises concerns about potential waste, fraud, and abuse. Therefore, the Staff Proposal recommended adopting a procurement and direct-ship model, which will provide a more personalized and efficient approach to customers, over the voucher model.

7.8.1. Party Positions

CCASDHH supports a voucher option for equipment, accessories, and services. CCASDHH says the benefits of a voucher system include saving space on equipment storage, allowing program participants to purchase a different brand of equipment that better fits their individualized needs not offered by CTAP and providing a mechanism for the program to evolve as new equipment and technology become available. This system may need to include warranties or protection for lost or broken equipment. CCASDHH says it does not make sense for the State of California to own and loan the equipment, especially when equipment becomes outdated and ends up sitting in a public funded warehouse.¹⁴²

The Joint Commenters are skeptical of utilizing a voucher model or prepaid credit cards for equipment, accessories, or services. The Joint Commenters support rules that allow consumers the flexibility to obtain equipment the best fits their needs, but have concerns of potential waste, fraud, and abuse that may come with a “voucher” or “coupon” system. The Joint Commenters claim that under this system, providers have an incentive to push

¹⁴¹ <https://www.tedpa.com/state-programs>

¹⁴² See opening comments of CCASDHH filed 1/9/2024 at 3.

consumers to purchase more expense (and often unnecessary) services or bundles. They advise the Commission to not implement any voucher system without safeguards against provider waste, fraud, and abuse, and have sufficient enforcement capacity to monitor the success or failure of those safeguards.¹⁴³

The Joint Commenters oppose program changes that allow consumers to apply their subsidy or benefit to any of a providers' service offerings because of concerns that providers would steer program participants towards more expensive offerings. Similarly, there are concerns that providers might increase their prices to collect as much of the subsidy as possible.¹⁴⁴ The Joint Commenters advise that to the extent California Connect participants were to use a voucher to receive a discount of mass-market equipment, such as an iPhone, those concerns are diminished, because the relatively small number of California Connect participants buying that equipment would likely not be significant enough to motivate equipment sellers to increase prices. However, if the participant uses a voucher to purchase specialized equipment such as an artificial larynx, the risk that a seller might raise the price is much higher.¹⁴⁵

The Joint Commenters support a "direct procurement and shipping model" which would allow program participants to select equipment and have that equipment shipped directly to them.¹⁴⁶ The Joint Commenters point out that in other Commission programs, indirect procurement and shipping have been inefficient and, in some instances, interfered with program participation. The

¹⁴³ See reply comments of CforAT and TURN, filed 1/22/2024 at 5.

¹⁴⁴ See comments of CforAT and TURN, filed 10/11/2024 at 21-22.

¹⁴⁵ *Ibid.* at 22.

¹⁴⁶ See comments of CforAT and TURN, filed 6/6/2025 at 4.

Joint Commenters advise that a direct procurement and shipping model avoids these issues and allows consumers to obtain equipment in a timely manner.¹⁴⁷

7.8.2. Discussion

The Commission agrees with the Staff Proposal and the Joint Commenters that a voucher, or coupon system has the potential to introduce waste, fraud, or other abuse into California Connect. The program's resources would be better spent without the need for monitoring and enforcement that a voucher or coupon system would require. We agree that the proposed "Procurement and Direct-Ship Model" will expand opportunities for California Connect subscribers to get the personalized equipment they need, while increasing efficiency and reducing the resources involved with storing equipment in a warehouse. The Communications Division should implement a direct procurement and shipping model.

7.9. Extending Service Access

California Connect Service Centers are physical locations where individuals with disabilities can receive personalized assistance, including consultations, hands on experience with California Connect equipment, and training on how to use it. There are currently 15 California Connect service centers located in Arcata, Bakersfield, Barstow, Claremont, Fresno, Merced, Redding, Riverside, Sacramento, San Diego, San Jose, San Luis Obispo, Santa Rosa, and Sonora. These locations were selected based on an analysis of different variables, including demographics and population data. However, the service centers are not equally distributed around California and may not always be available to people with disabilities after a disaster. The Needs Assessment

¹⁴⁷ See comments of CforAT and TURN, filed 6/6/2025 at 5.

Report also identified service gaps in rural areas, where many individuals are unaware of California Connect offerings.

In response to this barrier, the Staff Proposal recommended expanding access via partnerships with CBOs.¹⁴⁸ California Connect currently operates two service centers in collaboration with CBOs.

7.9.1. Party Positions

Cal Advocates claims there are not enough CTAP service centers to adequately serve the needs of people with disabilities. CTAP service centers are clustered primarily in major urban areas, which limits access to vital California Connect support for people with disabilities residing in rural and suburban communities, especially for the northernmost counties.¹⁴⁹ Cal Advocates notes that the Redding CTAP center, which functions only four days per month, is the only service center available for the northernmost California counties. This results in a round-trip drive exceeding four hours from some locations.¹⁵⁰ CTAP service centers should be easily accessible for Californians who visit them.¹⁵¹

Cal Advocates also recommends increasing the number of field advisors and field advisor visits in counties with less or no CTAP service centers to provide on-site support and equipment access in underserved areas and during emergencies.¹⁵² Cal Advocates also recommends that instead of expanding permanent service centers tied to a fixed location, the Commission should

¹⁴⁸ See reply comments of Cal Advocates filed 1/22/2024 at 3.

¹⁴⁹ *Id.*

¹⁵⁰ *Id.*

¹⁵¹ *Id.*

¹⁵² *Ibid.* at 5.

establish mobile units in counties that are prone to disasters.¹⁵³ Cal Advocates recommends the Commission establish temporary California Connect service centers in areas recovering from any form of disaster and broadly establish more CTAP service centers.¹⁵⁴ Cal Advocates also supports the Commission collaborating with CBO.¹⁵⁵

The Joint Commenters point out that rural residents must travel long distances to get to a CTAP service center, that have limited operating hours.¹⁵⁶ Additionally, the Joint Commenters point out that many counties without a service center are in HFTDs, have declared a state of emergency within the past two years, and/or have a significant population (over 10%) of people with disabilities.¹⁵⁷ They also claim that a greater proportion of residents in rural areas have a disability than residents in urban areas.¹⁵⁸ The Joint Commenters support Cal Advocates' recommendation to engage in partnerships with CBOs that serve people with disabilities in rural areas to more immediately address this deficiency and improve program access.¹⁵⁹

NDC recommends that the Commission provide resources to community-based groups to promote California Connect.¹⁶⁰ Grants provided by California Connect could provide dedicated funding to CBOs, enabling them to assist with

¹⁵³ See comments of Cal Advocates filed 10/11/2024 at 3.

¹⁵⁴ See comments of CforAT and TURN filed 10/11/2024 at 12.

¹⁵⁵ See reply comments of Cal Advocates filed 1/22/2024 at 7.

¹⁵⁶ *Ibid.* at 5.

¹⁵⁷ *Ibid.* at 5-6.

¹⁵⁸ *Ibid.* at 6.

¹⁵⁹ *Id.*

¹⁶⁰ See Comments of NDC filed 1/9/2024 at 4. See comments of NDC filed 1/9/2024 at 4.

California Connect outreach, including assessing individuals with disabilities for eligibility, housing eligible devices, administering program surveys, and promoting the program.¹⁶¹ This approach would ensure that persons with disabilities in these high-need areas are the first to benefit from expanded program access, aligning with Cal Advocates' recommendation to "engage in partnerships with CBOs that serve people with disabilities in rural areas to address this deficiency and improve program access more immediately."

7.9.2. Discussion

The Commission supports the Staff Proposal's recommendation to identify gaps in service access coverage and enlist the assistance of CBOs to expand the support offered by service centers in underserved areas. However, we find it premature to authorize a separate CBO compensation structure or grant program for such work in this program. As mentioned in section 7.4.2 above, a similar compensation program is being developed in the Lifeline program, and a similar compensation program already exists in the CARE program. Therefore, we should look to those efforts for guidance and determine if any of those two would be a good model for California Connect. The Communications Division shall monitor the development of the trusted partner proposal in the Lifeline proceeding, compare it to the CBO compensation structure in the CARE program, and then propose a path forward for partnering with CBOs in California Connect. Any final compensation structure approved for California Connect shall align with existing and approved compensation structures for similar Commission authorized assistance programs, such as CARE and Lifeline.

See comments of NDC filed 1/9/2024 at 4.

7.10. Advisory Committee Charters

The TADDAC and EPAC advise on matters of program policy and equipment. Their charters have not been updated since 2004 and do not adequately reflect the committee members' roles in the modernization and evolution of technology, telecommunication services, and equipment.¹⁶²

The Staff Proposal recommended collaborating with TADDAC and EPAC to explore opportunities to update their respective charters. Charter updates should include updating references to regulations, including communication equipment and services, changing terminologies, and expanding the area of disability representation for new member seats on both EPAC and the TADDAC. Updated charters will enhance the committees' effectiveness and alignment with the evolving goals of California Connect to better serve consumers by providing broadband and wireless equipment and services.¹⁶³

7.10.1. Party Position

No party comments were received on this topic.

7.10.2. Discussion

The Commission supports the Staff Proposal's recommendation to work with TADDAC and EPAC to update their respective charters. The Communications Division should revise these charters at least every five years, as significant changes to the program are made, and as applicable statutes are changed. Communication Division should collaborate with the advisory committees when updating or revising their respective charters. The advisory committee charter revision updates will be finalized with the committee's final approval.

¹⁶² See Staff Proposal at 32-33.

¹⁶³ *Id.*

7.11. Ongoing Needs Assessments and Surveys

The Needs Assessment Report was completed shortly before the onset of the COVID-19 pandemic, which has rendered some of its findings somewhat outdated. Although feedback from parties and Public Participation Hearing speakers' remarks were obtained,¹⁶⁴ a follow-up study would be valuable, providing essential updates to supplement the original data and offering more relevant insights.¹⁶⁵

To maintain program effectiveness and data-driven decision-making, the Staff Proposal recommended conducting a Needs Assessment every five years, ensuring continuous evaluation and adaptation. These collective efforts will modernize the program's infrastructure and strengthen its role as a critical resource for Californians with disabilities, ensuring equitable access to essential communications services.¹⁶⁶

The Staff Proposal also recommended contracting with an external entity to administer the Needs Assessment, ensuring an objective and comprehensive approach. The LifeLine program successfully used this model when it partnered with California State University, Sacramento, for its needs assessment.¹⁶⁷ The Communications Division intends to contract with a neutral third party with expertise in research and study methodologies, capabilities that extend beyond the scope of the Commission's internal resources.¹⁶⁸

¹⁶⁴ See reply comments of TURN and CforAT filed 1/22/2024 at 8.

¹⁶⁵ See comments of TURN and CforAT filed 1/9/2024 at 12-14.

¹⁶⁶ See Staff Proposal at 33.

¹⁶⁷ <https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/lifeline/california-lifeline-program-assessment-and-evaluation>.

¹⁶⁸ See Staff Proposal at 33-34.

7.11.1. Party Positions

Cal Advocates advises that, in order to make improvements to California Connect periodically, the Commission should conduct future surveys or receive feedback by partnering with CBOs to design and implement surveys and feedback channels. This can also be implemented with CTAP service center visitors to understand the needs of people with disabilities. Surveys could be in-person, online, or distributed through email lists and social media channels of disability advocacy groups.¹⁶⁹

The Joint Commenters advise that the Needs Assessment should not be the Commission's only attempt at engaging the disability community. The Communication Division's in-person CBO visits took place between fall 2019 and March 2020. Staff also conducted online surveys, but the Needs Assessment is not clear as to whether any data was collected during or after the COVID pandemic. It is highly likely that the telecommunications needs of people with disabilities, much like the needs of the general population, have changed significantly since the onset of the pandemic.¹⁷⁰ The Joint Commenters recommend that Commission staff perform another round of CBO visits and surveys to address these deficiencies and gather updated feedback about the topics explored in the Needs Assessment.¹⁷¹

The Joint Commenters believe the Commission would greatly benefit from more input from the Deaf and Hard of Hearing (DHH) and disability communities, including the lived experience of people who are DHH and/or

¹⁶⁹ See opening comments of Cal Advocates filed 1/9/2024 at 7.

¹⁷⁰ See opening comments of CforAT and TURN filed 1/9/2024 at 13.

¹⁷¹ *Ibid.* at 13-14.

people with disabilities.¹⁷² These topics include emergency preparedness, program certification requirements, ways to encourage technological innovation, and ways to design and implement future surveys.¹⁷³ To effectively gather this information, the Commission should develop an ongoing partnership with organizations and projects that serve people who are hard of hearing and people with disabilities.¹⁷⁴

The Joint Commenters encourage the Commission to modify the Needs Assessment by conducting further outreach, potentially in partnership with Deaf Counseling Advocacy and Referral Agency (DCARA), GLAD, the California Foundation for Independent Living Centers (CFILC), and/or AbilityTools (a program for the CFILC) and updating the Needs Assessment with the results of that outreach. The Joint Commenters state that CforAT is happy to assist the Commission with contacting those organizations if the Commission finds it helpful.¹⁷⁵ The Joint Commenters encourage the Commission to reach out to a broad range of CBOs to collect their input and learn about best practices.¹⁷⁶

7.11.2. Discussion

The Commission agrees with and adopts the Staff Proposal's recommendation to conduct the Needs Assessment at least every five years. The Commission encourages the Communications Division to coordinate with external entities to help administer the needs assessment effort. Outreach should be pursued through a variety of methods and implement multiple feedback

¹⁷² See comments of CforAT and TURN filed 10/11/2024 at 2.

¹⁷³ *Id.*

¹⁷⁴ *Id.*

¹⁷⁵ *Ibid.* at 3.

¹⁷⁶ *Ibid.* at 13.

channels. The Communications Division is encouraged to contract with a neutral third party with expertise in research and study methodologies. The Commission also agrees with the Joint Commenters that the needs assessment should not be the Commission's only attempt to engage with people who are deaf or have other disabilities. The Communications Division should be continuously open to feedback from a variety of sources.

7.12. Financial and Operational Considerations

Based on the changes recommended in the Staff Proposal, minimal funding, rule, or service impacts are anticipated, as the program transitions from landline-based equipment and services to IP and wireless technologies. These changes primarily involve a shift in the mode of delivery rather than a significant change in service offerings. This evolution is expected to streamline operations without incurring excessive additional costs, thereby ensuring continued service availability while modernizing the infrastructure.¹⁷⁷

7.12.1. Party Comments

No party comments were received on this topic.

7.12.2. Discussion

Based on the changes adopted in this decision, the Commission anticipates minimal funding, rule and service impacts from the transition from landline-based equipment, and service to IP and wireless technologies. Program costs may rise if the program is successful in becoming more accessible and benefiting a larger share of the eligible population, while the program may achieve some savings from switching to newer and more efficient technologies and distribution methods. The Communications Division will track any related cost increases or savings from these changes in service and equipment offerings. Such

¹⁷⁷ See Staff Proposal at 34.

documentation may be helpful or necessary to plan for future evolutions of California Connect.

8. Environmental and Social Justice (ESJ) Action Plan

On April 7, 2022, the Commission adopted version 2.0 of its ESJ Action Plan as a comprehensive strategy and framework for addressing ESJ issues in each proceeding. Environmental justice means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, and enforcement of environmental laws, regulations, and policies. The Commission's ESJ Action Plan identifies existing inequities and proposes actions for how the Commission can use its regulatory authority to address health and safety, consumer protection, program benefits, and enforcement to encompass all the industries it regulates, including energy, water, and communications programs.

The changes to California Connect made in this decision advance the following ESJ goals:

- Goal 1: Consistently integrates equity and access considerations throughout Commission regulatory activities.
- Goal 3: Strives to improve access to high-quality water, communications, and transportation services for ESJ communities.
- Goal 5: Enhances outreach and public participation opportunities for ESJ communities to meaningfully participate in the Commission's decision-making process and benefit from Commission programs.
- Goal 6: Enhances enforcement to ensure safety and consumer protection for all, especially for ESJ communities.

9. Summary of Public Comment

Rule 1.18 allows any member of the public to submit written comment in any Commission proceeding using the “Public Comment” tab of the online Docket Card for that proceeding on the Commission’s website. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding.

The Commission received twelve written comments on the Docket Card for this proceeding. Many of these written comments state the importance of ensuring that any updates to California Connect make the program more inclusive, easier to use and accessible. There are also comments emphasizing the importance of maintaining program service to landline as cell service is not available in all areas. Other commenters urged the Commission to continue the program with no reductions in service to disabled persons.

In addition to the written comments on the Docket Card, the Commission received public comments at the thirteen PPHs that it conducted throughout California and virtually. Of the members of the public that spoke at the PPHs, almost all expressed general support for updating California Connect. Many speakers noted that the technologies currently available through California Connect are outdated. Speakers supported making cellular devices and other translation devices that could be available outside of the home available through California Connect. Speakers advocated for other technological updates, including Bluetooth equipment, iPads, video remote interpreting services, services for deaf or hard of hearing persons who are unable to use sign language, and tools that assist in the writing of emails. Speakers also requested that the Commission continue to update the products available through the program as new technology becomes available.

Speakers emphasized the importance of accessing updated technologies in the California Connect program during natural disasters. Speakers noted that cellular and translation devices enable disabled persons to receive important communications during natural disasters, like the Los Angeles fires, and help them feel connected.

Several speakers expressed the importance of making updates to California Connect with the input of the deaf and disabled community to be as inclusive as possible, regardless of income, disability or age. In particular, speakers emphasized that senior citizens who are deaf or disabled may need special support to use devices available to them in the program.

Some speakers voiced that when making updates to California Connect, the Commission should retain tools for landline services. These speakers expressed that landline service is often important in areas where cell service is less available, or for older individuals. Speakers also noted that upgrades should be made to landline services where available.

Several speakers also raised concerns that information about California Connect is not widely available, and that many deaf and disabled persons do not know about the program at all. Speakers noted that service centers for the program are not available in every part of the state which can make it difficult for people in rural areas to get information about California Connect. Speakers advocated for increasing awareness about the California Connect using a variety of methods, including in-person events, internet notices, and flyers and posters, to reach as many people as possible. Speakers also stated that information about California Connect should be made available in languages other than English.

There were also speakers that wanted to make the Commission aware of issues with disabilities acquired later in life and with aging. There are senior

citizens who may have lost their hearing as older adults and lack the ability to communicate via sign language. Additionally, caregivers and parents of children with disabilities need to understand how to apply for and utilize the equipment and services offered by California Connect.

Speakers also voiced the importance of providing access to ASL translation services in the California Connect program. Speakers noted that many members of the deaf community speak English as a second language, and ASL as their first, and it is much easier for them to communicate in ASL, as opposed to reading English.

Other speakers noted that demonstrating their disability to prove eligibility for the California Connect can be challenging and is often something that disabled persons are required to do repeatedly. These speakers recommended providing different ways for disabled persons to demonstrate eligibility other than providing documentation from a medical provider.

10. Conclusion

This decision updates California Connect, in the following ways:

- Communications Division staff will work with OGA on potential changes to statute on the requirement of obtaining a medical profession's certification to qualify for program services.
- The California Connect application will be made available online as well as in hard copy.
- The California Connect sub-programs (EDP, the Voice Options Program, and AAC) will be consolidated and re-branded under the unified "California Connect" brand, with a single-application process.
- CBOs may be compensated for outreach efforts, assisting and enrolling participants into the program, and providing services in areas where no California Connect service center is located.

- California Connect will be marketed alongside LifeLine, Medical Baseline, and other programs as appropriate to promote each other's programs in their informational and educational materials.
- The Communication Division will collaborate with CalOES and other appropriate agencies to ensure the needs of the deaf and disability communities are met in times of an emergency.
- The Communications Division will work with EPAC, TADDAC and the California Connect contractor staff to identify new technologies, equipment and services and evaluate the adoption of equipment and services into the program.
- A direct procurement and shipping model will be implemented for the procurement and distribution of equipment.
- The Communications Division will work with the TADDAC and EPAC advisory committees to update their charters at least every five years, as significant changes to the program made, and as applicable statutes are changed.
- A needs assessment on the program will be conducted at least every five years and may be conducted by a third party.
- Although minimal funding, rule, or service impacts are anticipated, Communications Division will monitor for any related cost increases or savings from the change in service and equipment offerings made in this decision.

11. Procedural Matters

This decision affirms all rulings made by the ALJ and assigned Commissioner in this proceeding. All motions not ruled on are deemed denied.

12. Comments on Proposed Decision

The proposed decision of Commissioner Darcie L. Houck in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities

Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on _____, and reply comments were filed on _____ by _____.

13. Assignment of Proceeding

Darcie L. Houck is the assigned Commissioner and David R. Van Dyken is the assigned ALJ in this proceeding.

Findings of Fact

1. The Communications Division's Needs Assessment report concluded that gap exists between what the California Connect program presently offers and the current needs of the deaf and disabled community, that the program has not evolved with advances in technology and participant needs.
2. Since California Connect was initially implemented in 1979, there have been many advancements and other changes in telecommunications technologies.
3. Pub. Util. Code Section 710 which prohibited the Commission from "exercising regulatory jurisdiction or control" over VoIP and IP enabled services, contained a sunset date of January 1, 2020 and no longer applies.
4. D.24-11-003 confirmed that the Commission has regulatory authority over VoIP services as it relates to equipment and services offered by California Connect.
5. The requirement to be evaluated by a licensed medical professional to certify the disability and qualify for California Connect is set in Pub. Util. Code Section 2881, and cannot be changed in a Commission decision.
6. The California Connect application process is complex, burdensome and creates a barrier to participation.

7. The three California Connect sub-programs (EDP, CRS, and AAC), have distinct brand names and separate applications which cause customer confusion.
8. Collaboration with CBOs and other similar assistance programs would improve California Connect's visibility and enrollment, particularly in underserved, rural, and unserved tribal communities.
9. The Commission's California Lifeline program is exploring a trusted partner program in R.25-11-005 and the CARE program has an existing CBO compensation program that can be used to inform and develop the CBO compensation program for California Connect.
10. People with disabilities face disproportionate impacts from disasters compared to people without disabilities.
11. Despite the shift in preference from copper services and consumers' increasing reliance on VoIP, wireless phones, and other internet protocol enabled devices, California Connect continues to offer landline phones and primarily landline accessories.
12. California Connect's current equipment, service procurement, and distribution processes are inefficient, and has deterred customers. Adopting a direct procurement and shipping model would eliminate warehouse storage costs, allowing consumers to receive their equipment more quickly.
13. California Connect's 15 service centers are not equally distributed around California and may not always be available to people with disabilities after a disaster.
14. California Connect's TADDAC and EPAC charters have not been updated since 2004 and do not adequately reflect the committee members' roles in the modernization and evolution of technology, telecommunication services, and equipment.

15. Pub. Util. Code Section 2881(k) requires the Commission to perform an ongoing Needs Assessment of California Connect but does not specify the frequency or other details.

16. Minimal funding, rule and service impacts are expected from the transition from landline-based equipment, and service to IP and wireless technologies.

Conclusions of Law

1. The requirement to be evaluated by a licensed medical professional to certify the disability and qualify for California Connect is set in Pub. Util. Code Section 2881 should be revisited in a manner that reduces barriers to enrollment.

2. The California Connect current application process is complex and should be streamlined and offered electronically to reduce barriers to participation.

3. The three California Connect sub-programs (EDP, CRS, and AAC) should be consolidated and marketed under one brand name to reduce confusion.

4. Collaboration with CBOs and other similar assistance programs should be explored to increase enrollment, outreach and reduce barriers.

5. The Lifeline program's trusted partner proposal and CARE's CBO compensation program should provide inform the CBO compensation model for California Connect.

6. The Communications Division should continue to work with EPAC and TADDAC to identify and propose equipment and services that keep pace with advancements in technology.

7. The "Procurement and Direct-Ship Model" will expand opportunities for California Connect subscribers to get the personalized equipment they need, increase efficiency, reduce resources involved with storing equipment in a warehouse, and should replace the current model.

8. California Connect's TADDAC and EPAC charters are outdated and should be updated.

9. The Needs Assessment should be conducted more periodically and at least every five years in order keep pace with the advancements in technology and participant needs.

10. Minimal funding, rule and service impacts are anticipated from the changes made in this decision, however, the Communications Division should track any related costs increases or savings from these changes to plan for future evolutions of California Connect.

O R D E R**IT IS ORDERED** that:

1. The Deaf and Disabled Telecommunications program, also known as the California Connect program, shall be updated accordingly:
 - (a) The application will be made available online as well as in hard copy;
 - (b) All sub-programs will be consolidated and re-branded under the unified "California Connect" brand, with a single application;
 - (c) A compensation structure will be considered for collaborating with community-based organizations and will be informed by existing compensation structures for similar Commission authorized assistance programs;
 - (d) The program will be marketed alongside the California LifeLine program, Medical Baseline, and other programs as appropriate to promote each other's programs in their informational and educational materials;
 - (e) The Communications Division will collaborate with the California Office of Emergency Services and other appropriate agencies to ensure the needs of the deaf and disability communities are met in times of an emergency;

- (f) The Communications Division will work with the Telecommunications Access for the Deaf and Disabled Administrative Committee, the Equipment Program Advisory Committee and the California Connect contractor staff to identify new technologies, equipment and services that keep pace with advancements in technology;
- (g) A direct procurement and shipping model will be implemented for the procurement and distribution of equipment;
- (h) The Telecommunications Access for the Deaf and Disabled Administrative Committee and the Equipment Program Advisory Committee charters will be updated at least every five years, as significant changes to the program made, and as applicable statutes are changed;
- (i) A needs assessment on the program will be conducted at least every five years and may be conducted by a third party; and
- (j) Costs and savings resulting from the change made in this decision will be tracked to plan for future evolutions of California Connect.

2. Rulemaking 23-11-001 is closed.

This order is effective today.

Dated _____, at Santa Maria, California.