



Decision \_\_\_\_\_

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

12/26

01:36 PM

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

Rulemaking 20-02-008  
(Filed February 27, 2020)  
R2002008

**INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY  
REFORM NETWORK**

**NOTE:** After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at [Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov).

<b>Intervenor:</b> The Utility Reform Network	<b>For contribution to Decisions (D.)</b> 24-12-006, D.25-06-003, D.25-08-050, D.25-10-025, D.25-11-008, and the implementation of D.23-06-003.
<b>Claimed:</b> \$120,295.63	<b>Awarded:</b> \$
<b>Assigned Commissioner:</b> Alice Reynolds	<b>Assigned ALJ:</b> Robyn Purchia
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	
<b>Date:</b> 01/23/2026	<b>Printed Name:</b> Alexandra Green

**PART I: PROCEDURAL ISSUES**  
***(to be completed by Intervenor except where indicated)***

<b>A. Brief description of Decision:</b>	<p><u>D.23-06-003</u>, in relevant part, approves LifeLine pilot programs to leverage Affordable Connectivity Program (ACP) funding to test LifeLine-supported standalone broadband and mobile broadband offerings.</p> <p><u>D.24-12-006</u> temporarily freezes the LifeLine specific support amount (SSA, i.e., the LifeLine subsidy) for wireless</p>
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	<p>and wireline providers at \$19.00 per month from January 1, 2025, through the earlier of December 31, 2026, or until the Commission establishes a new methodology for calculating the SSA.</p> <p><u>D.25-06-003</u> denies the petition to modify D.20-10-006 filed by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and TURN.</p> <p><u>D.25-08-050</u> approves a three-year, voluntary, technology-neutral, Home Broadband Pilot for eligible households to apply the California Universal Telephone Service Program subsidy to any Commission-approved internet plan meeting the minimum service standards.</p> <p><u>D.25-10-025</u> modifies D.24-05-003, which established the Foster Youth Pilot Program within the California Universal Telephone Service Program.</p> <p><u>D.25-11-008</u> adopts General Order (GO) 153-A, which incorporates substantive revisions that reflect changes authorized by the Commission in previous decisions, as well as non-substantive revisions.</p>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	Intervenor	CPUC Verification
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	March 10, 2020	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	August 11, 2006 <sup>2</sup>	
4. Was the NOI timely filed?		

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

<sup>2</sup> See comment in Part 1.C (Additional Comments on Part 1) below.

	Intervenor	CPUC Verification
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.06-05-028	
6. Date of ALJ ruling:	August 29, 2006 <sup>3</sup>	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.04-04-003 A.05-02-027 R.19-01-011	
10. Date of ALJ ruling:	July 27, 2004 <sup>4</sup> November 4, 2005 July 26, 2019	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-11-008	
14. Date of issuance of Final Order or Decision:	11/25/2025	
15. File date of compensation request:	01/23/2026	
16. Was the request for compensation timely?		

**C. Additional Comments on Part I: *(use line reference # as appropriate)***

#	Intervenor's Comment(s)	CPUC Discussion
B3, B6, B10	TURN relies on its NOI from R.06-05-028, which was the Commission's early LifeLine proceeding before the current proceeding (R.20-02-008) and the prior LifeLine proceeding (R.11-03-013). Since R.06-05-028, in subsequent orders instituting rulemakings, the Commission retained all intervenor	

<sup>3</sup> See comment in Part 1.C (Additional Comments on Part 1) below.

<sup>4</sup> See comment in Part 1.C (Additional Comments on Part 1) below.

#	Intervenor's Comment(s)	CPUC Discussion
	compensation findings and filings. <i>See</i> OIR (R.11-03-013) at p. 15; OIR (R.20-02-008) at p. 7. <i>See also, e.g.</i> , Decisions 19-01-017 and 20-12-040 (R.11-03-013) (the Commission relied on TURN's NOI and showings from R.06-05-028).	

**PART II: SUBSTANTIAL CONTRIBUTION**  
*(to be completed by Intervenor except where indicated)*

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): *(For each contribution, support with specific reference to the record.)*

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
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<p><b><u>0. General Introduction</u></b></p> <p>This compensation claim includes work on five final decisions in the LifeLine proceeding and the implementation of one other decision. Though there are shared issues, throughlines, or concepts between some of these decisions, most decisions represented in this claim addressed or built on a distinct facet of the program, and most resulted in direct benefits for LifeLine-eligible households.</p> <p>D.23-06-003 created LifeLine pilot programs that allowed subscribers to bundle state LifeLine, federal Lifeline, and federal ACP subsidies for a line of standalone broadband or wireless broadband service. The ACP Pilots, as their name implies, were dependent on the continuance of ACP funding and required the Commission to determine a process for concluding the pilot when the ACP exhausted its funding and began winding down in early 2024.</p> <p>D.24-12-006 temporarily froze the California LifeLine SSA to give the Commission time to calculate a new methodology while controlling costs for both surcharge-payers and LifeLine subscribers.</p> <p>D.25-06-003 denied a petition to modify the LifeLine program to temporarily allow LifeLine subscribers to apply their LifeLine subsidy to standalone broadband as a replacement for the federal ACP. The Commission denied this petition on procedural grounds but continued to pursue the concept of a LifeLine subsidy for standalone broadband, which culminated in the LifeLine Broadband Pilot, enacted in D.25-08-050.</p> <p>D.25-10-025 modified the rules of the LifeLine Foster Youth Pilot in response to a Petition for Modification filed by Youth Law Center (YLC), resulting in increased access to the pilot</p>		
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program and the implementation of a non-usage policy.		
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Finally, D.25-11-008 adopted a revised version of the General Order summarizing the LifeLine program rules to codify various prior changes the Commission enacted in the past few years.

<p><b><u>1. The 2022 LifeLine Program Assessment</u></b></p> <p>In 2022, the Commission released an assessment of the California LifeLine program in partnership with staff of California State University, Sacramento's Consensus and Collaboration Program (CCP). The Commission then solicited party comment based on the findings of the Program Assessment and how the Commission should update the LifeLine program.</p> <p><b><u>a. Applying Affordability Metrics to Subscriber Co-Payments</u></b></p> <p>In its reply comments on the Program Assessment, TURN, co-writing with the Greenlining Institute (GLI), recommended that the Commission apply the affordability metrics it developed in R.18-07-006 to the co-payments of LifeLine subscribers, as not all LifeLine co-payments appear to be affordable.</p> <p>The Commission has since opened a new LifeLine Rulemaking, R.25-11-005, and released a staff proposal regarding updates to the California LifeLine SSA and minimum service standards (MSS). This staff proposal includes an affordability review of LifeLine plans with co-payments, in which Staff applies the Commission's affordability ratio metric to LifeLine co-payments varying from \$5 to \$25 and found that even a \$5 co-payment would be unaffordable for some households.</p> <p>The Commission's review of the LifeLine SSA, including subscriber co-payments, remains ongoing, as discussed in further detail below. For an alternative proposal for compensation for the time spent on this issue, please refer to Part III(A)(b) (Reasonableness of hours claimed), below.</p>	<p><i>See generally California LifeLine Program Assessment &amp; Evaluation (May 20, 2022).<sup>5</sup></i></p> <p>Reply Comments of TURN and GLI on the ALJ's Ruling Requesting Comments on the Program Assessment (TURN Program Assessment Reply Comments) (July 1, 2022) at pp. 6-7.</p> <p>Staff Proposal on LifeLine SSA and MSS, issued in R.25-11-005 (Nov. 3, 2025), at pp. 11-14.</p>	
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<sup>5</sup> Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M478/K367/478367564.PDF>.

<p><u>b. Defending LifeLine Minimum Service Standards</u></p> <p>TURN responded to a proposal by another party, Cox California, recommending that the California LifeLine program model itself after the federal Affordable Connectivity Program (ACP) and turn LifeLine into a discount that could be applied to a service provider's retail plans. This proposal would effectively eliminate California LifeLine's minimum service standards (MSS) – the minimum amount of voice calling, text messaging, and mobile data a plan must offer to be eligible for the LifeLine subsidy. TURN noted that at the time, ACP was still a new program, and the Commission had previously implemented a pilot program (the Boost/CARE Pilot) that had allowed subscribers to enroll in the retail plan of their choice. That pilot ended up being difficult to administer and did not accomplish its goals of facilitating LifeLine participation.</p> <p>Consistent with TURN's recommendation, the Commission did not adopt Cox's suggestion. The next year, the Commission issued a proposal for updating the California LifeLine MSS, and, as discussed above, is continuing to examine the issue in the new LifeLine rulemaking, R.25-11-005. For an alternative proposal for compensation for the time spent on this issue, please refer to Part III(A)(b) (Reasonableness of hours claimed), below.</p>	<p>Comments of Cox California Telecom, LLC in Response to ALJ Ruling (June 17, 2022) at pp. 4-5.</p> <p>TURN Program Assessment Reply Comments at pp. 1-6.</p> <p><i>See generally</i> Staff Proposal on LifeLine SSA and MSS (Nov. 6, 2023); Staff Proposal on LifeLine SSA and MSS, issued in R.25-11-005 (Nov. 3, 2025).</p>	
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<p><b><u>2. Wind-Down of the ACP Pilot</u></b></p> <p>In the decision establishing the ACP Pilots, the Commission determined the ACP pilots would end “on the date that is the sooner of (a) two years after the effective date of this decision, or (b) on the date that ACP concludes.” D.23-06-003 established procedures for participating service providers to notify pilot subscribers of the end of ACP Pilot subsidies and, for wireless providers, to transfer their subscribers to standard California LifeLine service plans. In January 2024, the Federal Communications Commission announced that it was beginning to wind down the ACP due to projected exhaustion of funding after April 2024.</p> <p>In comments filed in mid-February 2024, TURN noted the impending end of ACP funding and recommended that the Commission take prompt action to wind down the ACP Pilots as well so that subscribers would receive adequate notice of the end of the Pilots. TURN also noted that the one participating wireline voice provider had not identified a replacement California LifeLine service plan to which it would transfer customers at the end of the ACP Pilots and recommend that it specify a replacement plan.</p> <p>On March 27, 2024, Judge Purchia issued a ruling clarifying that the ACP Pilots would continue through the end of May 2024 and that if the ACP received no further funding by the end of April 2024, participating service providers must begin informing their ACP Pilot subscribers of changes to their service by May 1, 2024.</p>	<p>D.23-06-003 (June 9, 2023) at pp. 17-18.</p> <p>Reply Comments of TURN on the ALJ's Ruling on Subsidy and Service Standard Staff Proposal (TURN SSA &amp; MSS Replies) (Feb. 16, 2024) at pp. 1-3, 25.</p> <p>ALJ's Ruling Clarifying ACP Pilot Programs will Continue to May 31, 2024 (Mar. 27, 2024).</p>	
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<p><b><u>3. Work and Advocacy Related to Updating the LifeLine Specific Support Amount and Minimum Service Standards</u></b></p> <p>In late 2023, the Commission issued a proposal to update the California LifeLine SSA and MSS. In response to the Commission's request for comment on this staff proposal, TURN conducted and presented analysis of relevant wireless and broadband plans and provided recommendations regarding SSA and MSS for wireline and wireless California LifeLine service.</p> <p>With the exception of the SSA freeze, discussed below, the Commission ultimately decided to revisit updates to the SSA and MSS in the successor LifeLine rulemaking, R.25-11-005. In that docket, the Commission has already released and solicited comment on a new SSA and MSS staff proposal, which uses a methodology that reflects the research and advocacy TURN presented in its filings in R.20-02-008. Specifically, in its prior work in this docket, TURN advocated that non-discounted retail offerings from non-LifeLine wireless providers as the upper limit for the wireless SSA, as TURN's analysis of retail wireless plans found that LifeLine providers' retail plans tended to diverge from non-LifeLine providers' retail plans. TURN also presented data that California LifeLine providers had absorbed previous increases in subsidies without commensurate increases in their LifeLine service offerings. In terms of wireline offerings, TURN presented analysis based on data request responses from multiple wireline carriers on their broadband internet offerings and compared them to the proposed speed MSS of 100/20 Gbps and data MSS of 1280 GB, ultimately determining that these proposed broadband MSS were reasonable. TURN also defended the need for broadband MSS.</p>	<p>Opening Comments of TURN on the ALJ's Ruling on Subsidy and Service Standard Staff Proposal (TURN SSA &amp; MSS Opening), (Jan. 24, 2024) at pp. 6-27; TURN SSA &amp; MSS Replies at pp. 5-36.</p> <p>OIR to Update the California LifeLine Program (Nov. 26, 2025) at pp. 5-6 (preliminarily scoping the issues of updating the SSA and updating GO 153 to "incorporate new technology"); November 2025 SSA &amp; MSS Staff Proposal.</p> <p>TURN SSA &amp; MSS Opening at pp. 9-12; TURN SSA &amp; MSS Replies at pp. 10-13, 16-19.</p> <p>TURN SSA &amp; MSS Opening at pp. 25-27; TURN SSA &amp; MSS Replies at pp. 30-31.</p> <p><i>See November 2025 SSA &amp; MSS Staff Proposal at pp. 8-10, 15-16, 20.</i></p>	
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Accordingly, the new staff proposal reflects this advocacy. For the wireless SSA, the staff proposal analyzed retail plans, including from wireless service providers that do not participate in California LifeLine, and proposed tiers of LifeLine service that use those retail offerings as a ceiling for the new proposed SSA. For the wireline broadband, the speed and data MSS remain the same as the prior staff proposal.

For an alternative proposal for compensation for the time spent on this issue, please refer to Part III(A)(b) (Reasonableness of hours claimed), below.

<p><b><u>4. SSA Freeze Introduction</u></b></p> <p>The LifeLine SSA is currently based on the most expensive Carrier of Last Resort's (COLR) rates for wireline basic service. AT&amp;T California is the most expensive COLR in California and continues to raise its basic service rates every year, which causes the LifeLine SSA to also increase every year. The Commission announced its intent to revisit this methodology and update the LifeLine minimum service standards (MSS) for both wireline and wireless service in November 2023 with its Staff Proposal on LifeLine Specific Support Amount and Minimum Service Standards (November 2023 Staff Proposal). In comments on the Staff Proposal, TURN and other parties first broached the concept of freezing (i.e., not annually adjusting) the SSA if the Commission needed additional time to revise the SSA methodology.</p> <p>In June 2024, the Commission issued a ruling seeking comment on a proposal to freeze the SSA at \$19/month until the Commission adopted a new methodology for calculating it. In November 2024, the Commission issued a narrow proposed decision that would do the same. In response, TURN continued to support the concept of an SSA freeze but advocated for limitations that would protect wireline LifeLine subscribers from having to pay unaffordable monthly co-payments. In addition, TURN cited public comments and analyzed LifeLine subscribership data to underscore the need for an SSA that makes wireline co-payments affordable and to support its policy recommendations. D.24-12-006 adopted several of TURN's recommendations to strike an appropriate balance between the need to steward surcharge-payer funds and the need to adequately subsidize LifeLine service.</p>		
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<p><b><u>4.1 Freezing the SSA as an Interim Solution</u></b></p> <p>In response to the November 2023 Staff Proposal, TURN recognized the need to revise the SSA methodology but advocated for further stakeholder input on the LifeLine SSA and MSS before the Commission made any changes. Recognizing that this process and addressing stakeholder concerns could require additional time, TURN, among other parties, recommended freezing the SSA as an interim solution while the Commission developed a new methodology. However, TURN was the only party to offer an additional rationale for the freeze: to retain California LifeLine newcomer (and non-Eligible Telecommunications Carrier) Red Pocket and encourage other providers to offer LifeLine plans comparable to non-discounted offerings of non-LifeLine MVNOs.</p> <p>In response to TURN's proposal, the ALJ issued a ruling in May seeking comments on a potential SSA freeze. In response, TURN continued to support a freeze while addressing affordability concerns of wireline LifeLine customers, discussed further below.</p> <p>The Final Decision froze the SSA for two years to give the Commission time to establish a new methodology.</p>	<p><i>Compare TURN Staff Proposal Reply Comments (Feb. 16, 2024) at pp. 5-7 with National LifeLine Association (NaLA) Staff Proposal Reply Comments (Feb. 16, 2024) at p. 5 and TracFone Staff Proposal Reply Comments (Feb. 16, 2024) at p. 5.</i></p> <p>TURN Reply Comments on ALJ Ruling (June 14, 2024) at p. 1.</p> <p>D.24-12-006 at p. 10, FOF 8, COL 2, OP 1.</p>	
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<p><b><u>4.2 Distinguishing between the Wireless and Wireline SSA</u></b></p> <p><b><u>a. Impact of Basic Service Rate Increases on Wireline Customers</u></b></p> <p>In its comments on the ALJ Ruling and Proposed Decision, TURN illustrated the impact of basic service rate increases on LifeLine wireline subscribers, who must pay a monthly co-payment to receive LifeLine service. To this end, TURN presented its analysis of comments from AT&amp;T wireline lifeline subscribers from Public Participation Hearings in other Commission proceedings and developed a graph and analysis comparing changes in basic service rates and wireline LifeLine subscribership over time. These unique contributions to the record on consumer perspectives supported TURN's advocacy on the need to consider the impact on wireline LifeLine subscribers over time if AT&amp;T, the largest wireline LifeLine provider, continued to increase its rates while the SSA was frozen.</p> <p>The Final decision expressed the Commission's own ongoing concerns about AT&amp;T's rate increases and acknowledged TURN's concerns about affordability, though the Commission was not persuaded by them. Nonetheless, TURN's work enriched the Commission's deliberation on whether to freeze the SSA.</p> <p><b><u>b. Separate Wireless and Wireline Freezes</u></b></p> <p>To prevent the co-payments for wireline LifeLine subscribers from becoming unaffordable due to further rate increases by AT&amp;T, TURN recommended that the Commission treat the wireless and wireline SSAs separately. Specifically, TURN recommended not freezing the wireline SSA so that it could increase in response to future rate increases or freezing it at a higher rate than the wireless SSA. AT&amp;T and Cox also made a version of this recommendation, but AT&amp;T did so because it believes that the current COLR</p>	<p>TURN Reply Comments on ALJ Ruling (June 14, 2024) at pp. 2-3; TURN Opening Comments on the Proposed Decision (Nov. 21, 2024) at pp. 1-3.</p> <p>D.24-12-006 at pp. 9-11.</p> <p><i>Compare</i> TURN Reply Comments on ALJ Ruling (June 14, 2024) at pp. 3-4; TURN Opening Comments on the Proposed Decision (Nov. 21, 2024) at p. 3 <i>with</i> AT&amp;T Opening Comments on ALJ Ruling (June 3, 2024) at pp. 2-4 <i>and</i> Cox California Reply Comments on ALJ Ruling (June 14, 2024) at pp. 1-2.</p>	
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<p>methodology is working well for setting the wireline SSA.</p> <p>The Final Decision did not set separate SSAs for wireline and wireless SSAs, but TURN’s work presented a solution with a unique rationale that informed the Commission’s decision making on how to freeze the SSA.</p>	D.24-12-006 at pp. 10-11.	
<p><b><u>4.3 Frozen Subsidy Amount</u></b></p> <p>As referenced above, TURN was one of the parties to initially recommend freezing the SSA, and with that recommendation, TURN proposed an amount of \$19 per month or 2023’s SSA of \$17.80 per month. TURN specifically recommended these numbers to encourage the continued LifeLine participation of providers like Red Pocket.</p> <p>The Final Decision adopted one of TURN’s proposed amounts and froze SSA at \$19.00 per month.</p>		

<p><b><u>4.4 Duration and End of the SSA Freeze</u></b></p> <p>In comments on the Proposed Decision, TURN noted that if the Commission took over a year to establish a new SSA methodology, AT&amp;T would have further opportunity to increase its basic service rate. To prevent LifeLine copayments from becoming unaffordable due to rate increases, TURN recommended that the freeze end after two years or once the Commission establishes a new SSA methodology, whichever occurs first. TURN recommended a two-year freeze because it would give the Commission up to twice the length of the current annual interval for re-evaluating the SSA to establish a new methodology.</p> <p>The Commission modified Final Decision to adopt TURN's recommendation, setting the freeze to end on December 31, 2026, or when the Commission establishes a new SSA methodology.</p>	<p>TURN Proposed Decision Opening Comments (Nov. 21, 2024) at pp. 1, 3.</p> <p>“TURN recommends that the Commission modify the proposed decision to end the freeze after two years or when the Commission adopts a new SSA methodology, whichever is sooner. We are persuaded that a freeze of, at most, two years is reasonable and prudent.” D.24-12-006 at p. 14.</p>	
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<p><b><u>4.5 Suspension of General Order 153, Section 8.5</u></b></p> <p>In comments on the Proposed Decision, TURN noted that the suspension of General Order (GO) 153, Section 8.5 could be overly broad, as Section 8.5 not only tasks Staff with annually setting the SSA but also requires COLRs to submit their basic service rates to the Commission for calculation of the SSA. TURN argued that this information was valuable even during the SSA freeze, as it could inform the Commission's future decisions about re-setting the SSA.</p> <p>The Commission did not adopt this specific recommendation, but TURN's work raised a potential issue with the implementation of the Final Decision that no other party noted.</p>	<p>TURN Proposed Decision Opening Comments (Nov. 21, 2024) at pp. 3-4.</p> <p>D.24-12-006 at COL 3.</p>	
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<p><b><u>5. Advocacy for an ACP Replacement</u></b></p> <p>After the end of the ACP, TURN and other consumer advocates recognized the need for a new program to subsidize standalone broadband. TURN had previously voiced concerns about widespread or unlimited subsidization of standalone broadband service supported by surcharges on only voice services but determined it could support such cross-subsidization on an interim basis to temporarily fill the void left by the ACP, which appeared on the brink of exhausting its funding and without hope of further appropriations. In its joint Petition for Modification of D.20-10-006 with Cal Advocates, TURN recommended that for two years, the Commission allow LifeLine subscribers to apply their state and federal subsidies to a standalone wireline broadband service offering that met proposed speed and data MSS.</p> <p>In its replies to other parties, TURN emphasized the limited scope of the proposed modification, describing it as “a temporary bridge akin to a pilot” and advocated against other parties’ calls to eliminate proposed MSS for standalone broadband, with TURN emphasizing that LifeLine is a class of service and not a voucher program.</p> <p>In its decision addressing the Petition for Modification, the Commission “overall agree[d]” with TURN’s goals, recognizing “that Californians require access to affordable, high-quality broadband service plans” and agreeing that “the Commission should explore ways to make broadband more affordable to Californians.” However, the Commission denied the petition on two procedural grounds: the timing of the Petition and the fact that D.20-10-006 only set program SSA and MSS through November 2021. By the time of the issuance of D.25-06-003, the Commission had already released its April 2025 Home Broadband Adoption Report and Ruling Requesting</p>	<p><i>See, e.g.,</i> TURN SSA &amp; MSS Replies at pp. 26-27.</p> <p>Cal Advocates and TURN Emergency Petition for Modification of D.20-10-006 (Apr. 23, 2024).</p> <p>Reply Comments of TURN to Cal Advocates and TURN Emergency Petition for Modification of D.20-10-006 (June 3, 2024), at pp. 2-6.</p> <p>D.25-06-003 at pp. 6-7.</p>	
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<p>Comments on Strategies to Address the Home Broadband Adoption Gap, discussed in more detail below, and encouraged parties to comment on them. While the specific Petition for Modification itself was unsuccessful, during its pendency, the Commission was considering solutions like the one TURN advocated for in the Petition and took action to address the concerns expressed in the Petition regarding sunset of ACP.</p>		
<p><b><u>6. The LifeLine Home Broadband Pilot</u></b></p> <p>In April 2025, the Commission released the Home Broadband Adoption Report, finding that a “substantial and growing” number of California households cannot afford home broadband service. The report also surveyed the current landscape of telecommunications affordability programs, noting the “significant gap” left by the wind down of the ACP. A ruling soliciting comments for parties on ways to foster home broadband (as opposed to mobile broadband delivered through a smartphone) adoption among low-income households accompanied this report.</p> <p>Some of the questions for comment asked parties about a potential pilot program for subsidizing standalone home broadband and how such a pilot should work, including questions about provider participation, funding, the number of subsidies per household, and what services should be supported.</p>	<p>Home Broadband Adoption Report (Apr. 16, 2025), at pp. 2-3.</p> <p>Home Broadband Adoption Report (Apr. 16, 2025), at pp. 33-34.</p>	

<p><b><u>6.1 Need for a Pilot</u></b></p> <p>TURN staunchly supported limited-duration support for standalone broadband, either through the main California LifeLine program or a pilot program—with particular preference for a pilot because of its inherently limited scope and duration.</p> <p>Other parties, such as AT&amp;T and CTIA, argued that the Commission should wait on the outcomes of pending legislation (Assembly Bill 535 and Senate Bill 716) before enacting a standalone broadband subsidy pilot. TURN preemptively addressed these concerns by pointing out that there was no guarantee that either would pass, and even if one or both did, a Pilot could complement those efforts by gathering relevant data.</p> <p>In response to industry parties' narrow interpretations of the April 2025 Home Broadband Adoption Report and related statistics, TURN argued that in addition to providing previously unconnected households with broadband, another critical benefit of the Home Broadband Pilot would be to keep households who could not consistently afford broadband connected.</p> <p>After the Home Broadband Adoption Report, The Commission proceeded to issue a proposed decision establishing the Home Broadband Pilot. It and the final decision, D.25-08-050, recognized the need for a broadband subsidy program, as advocated for by TURN, which could complement any related legislation the Legislature enacted.</p>	<p>Opening Comments of TURN on the Assigned Commissioner's Ruling Requesting Comments on Strategies to Address the Home Broadband Adoption Gap (TURN Broadband Report Opening Comments) (May 16, 2025), at pp. 2-4.</p> <p><i>See, e.g.</i>, TURN Broadband Report Opening Comments at p. 1. Reply Comments of TURN on the Proposed Decision of Com'r Reynolds Approving Home Broadband Pilot (TURN Broadband PD Reply Comments) (Aug. 19, 2025) at p. 2.</p> <p>Reply Comments of TURN on the Assigned Commissioner's Ruling Requesting Comments on Strategies to Address the Home Broadband Adoption Gap (Broadband Report Reply Comments) (May 28, 2025) at pp. 6-10; Reply Comments of TURN on the PD Approving Home Broadband Pilot (TURN Broadband PD Reply Comments) (Aug. 19, 2025) at pp. 6-10.</p> <p>D.25-08-050 (Sept. 4, 2025) at p. 9 (“[W]e have identified a need for California LifeLine to subsidize affordable home broadband for low-income Californians. As such, we authorize the Home Broadband Pilot.”), FOFs 11-12, COL 1.</p>	
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	<p>D.25-08-050 at pp. 12-13 (“Cal Advocates and TURN encourage the Commission to ‘act now’ with a pilot, which may complement the Legislature’s intent ‘to support broadband services for low-income households through low-cost plans and subsidized plans . . .’ We agree with Cal Advocates and TURN. There is an immediate need for the California LifeLine program to expand to offer access to affordable home broadband for low-income Californians.”).</p>	
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<p><b><u>6.2 Broadband Pilot MSS &amp; SSA</u></b></p> <p><b><u>a. Subsidy Amount</u></b></p> <p>TURN recommended a subsidy amount that would remain set for the entire pilot for stability and supported multiple tiers of service. TURN supported a subsidy amount of \$20/month for standalone broadband and noted other parties were converging on this number as well.</p> <p>The Commission adopted an SSA of \$20/month for standalone broadband and a separate SSA tier of \$30/month for bundled wireline broadband and voice.</p>	<p>TURN Broadband Report Opening Comments at pp. 11-12.</p> <p>TURN Broadband Report Reply Comments at pp. 12-13.</p> <p>D.25-08-050 at pp. 19-20, COL 8, OP 3.</p>	
<p><b><u>b. Federal Funding &amp; ETC Designations</u></b></p> <p>TURN recommended that the Commission not require participating service providers to have an ETC designation to maximize service provider participation. Additionally, TURN recommended that the Commission make up the lost federal subsidy for both (1) subscribers who qualify for LifeLine through the California-only eligibility criteria and (2) for Tribally-owned and -operated service providers that do not have an ETC designation. TURN argued that not making up the federal subsidy for California-only subscribers would effectively create a second class of service and make Pilot participation more difficult for those subscribers. For Tribal providers, TURN highlighted the unique situation of Tribally-owned service providers, high cost of broadband service on Tribal lands, and low rates of LifeLine participation in Tribal communities.</p> <p>The Commission decided to adopt TURN's recommendation and not require participating service providers to have an ETC designation but declined to make up lost funding for Tribal service providers, citing cost concerns.</p>	<p>Broadband Report Opening Comments at pp. 12, 16.</p> <p>Opening Comments of TURN on the PD Approving Home Broadband Pilot (TURN Broadband PD Opening Comments) (Aug. 14, 2025), at pp. 4-8.</p> <p>D.25-08-050 at p. 31, FOFs 27, 30, COLs 22-23.</p>	
<p><b><u>c. MSS for Broadband</u></b></p> <p>In its comments, TURN recommended that the Commission adopt MSS for Pilot-supported</p>	<p>TURN Broadband Report Opening Comments at pp. 8-11.</p>	

<p>broadband that met or exceeded the current broadband MSS for federal Lifeline to guarantee that ETCs participating in the Home Broadband Pilot would be eligible for federal subsidies. TURN advocated for broadband MSS as means to steward LifeLine funds, facilitate Pilot administration, and meet subscriber needs while minimizing upselling.</p>		
<p>The Commission adopted a technology-neutral broadband speed MSS of 100/20 Mbps and a data MSS of 1280 GB per month, consistent with the broadband MSS for federal Lifeline.</p>	<p>D.25-08-050 at p. 24, COL 13.</p>	
<p><b><u>d. MSS for Bundled Voice Service</u></b> The Proposed Decision version of D.25-08-050 did not establish MSS for voice service bundled with home broadband service. TURN recommended that the Commission establish MSS for bundled voice service to ensure that subscribers who chose to receive bundled service would receive access to voice service robust enough to meet their needs and allow them to participate in modern society. Specifically, TURN recommended that the Commission adopt MSS that at least met the voice MSS for federal LifeLine.</p>	<p>TURN Broadband Pilot PD Opening Comments at pp. 1-4.</p>	
<p>Commission declined to set MSS for bundled voice service. Nonetheless, TURN raised important consumer concerns to inform the Commission's decision-making on bundled service offerings.</p>	<p>D.25-08-050 at p. 20, COL 7.</p>	
<p><b><u>e. Cost of Equipment</u></b> In its opening comments, Charter “recommended” that the Commission “confirm” that providers could pass on the costs of equipment like modems and routers. TURN opposed this recommendation, arguing that equipment costs could become hidden fees of pilot participation and a barrier to participation.</p>	<p>TURN Broadband Pilot PD Reply Comments at pp. 4-5.</p>	

In the final decision, the Commission stopped short of requiring participating service providers to provide equipment for free but did partially adopt TURN's recommendation by encouraging providers to offer such equipment for free.	D.25-08-050 at pp. 21-22, FOF 21.	
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<p><b><u>6.3 Supported Technologies</u></b></p> <p><b><u>a. Essential Nature of Voice and Broadband</u></b></p> <p>In its opening comments on the Home Broadband Adoption Report, TURN emphasized the important role of voice and home broadband service and that households should not have to forgo one to access the other.</p> <p>As discussed above, the Commission authorized a bundled tier of Home Broadband Pilot service that includes voice service.</p>	<p>TURN Broadband Report Opening Comments at pp. 4-7.</p> <p>D.25-08-050 at pp. 19-20, COL 8, OP 3.</p>	
<p><b><u>b. Technology Neutrality</u></b></p> <p>The National LifeLine Association (NaLA), opposed the concept of limiting the Home Broadband Pilot to home broadband and instead advocated for a version of technology neutrality that included Home Broadband Pilot support for mobile broadband.</p> <p>TURN supported limiting the Home Broadband Pilot to technologies that provided home broadband and meet the Pilot's MSS to most directly advance the Pilot's goals of home broadband adoption. TURN also pointed out that wireless providers were already free to participate in California and federal Lifeline and receive comparable subsidies.</p> <p>The Commission agreed with TURN and found the Home Broadband Pilot could be technology neutral without supporting mobile broadband.</p>	<p>NaLA PD Opening Comments (Aug. 14, 2025) at pp. 2-4, 6.</p> <p>TURN Broadband Pilot PD Reply Comments at pp. 2-3.</p> <p>D.25-08-050 at p. 38 ("[T]he MSS is designed to fulfill the Pilot's objective of making broadband services that reflect Californians' substantial data usage needs affordable . . . . We also agree with TURN's assertion that subscribers may already receive mobile broadband service through California LifeLine's existing combined state and federal subsidy of \$28.25 a month.").</p>	

<p><b><u>6.4 Broadband Pilot Parameters</u></b></p> <p><b><u>a. Duration and Review</u></b></p> <p>TURN recommended a two-year pilot with regular analysis and presentation of pilot data. The Commission decided on a three-year duration for the Home Broadband Pilot, with Staff conducting analysis within 18 months of the Pilot's launch and sharing that analysis and related recommendations within 20 months of the Pilot's launch.</p>	<p>TURN Broadband Report Opening Comments at p. 18.</p> <p>D.25-08-050 at p. 15, FOFs 14-15, COL 4.</p>	
<p><b><u>b. Data Reporting</u></b></p> <p>TURN recommended that participating service providers should submit data on a monthly basis regarding subscribership rates, speed, and subscriber data consumption. TURN also supported a waiver for data consumption reporting for participating service providers that do not have systems to track subscriber data consumption. Finally, TURN defended the data reporting requirements in the proposed decision version of D.25-08-050 when other providers argued for reducing them.</p> <p>The Commission struck a balance and decided that providers would report data every six months, which would include information on data consumption, subscribership, and plan information. The Commission declined to adopt a waiver on data consumption tracking, highlighting the need to granularly track data consumption to ensure the Pilot provides service that meet subscriber needs. However, the Commission noted that D.25-08-050 authorized Staff to revise the Home Broadband Pilot requirements if needed.</p>	<p>TURN Broadband Report Opening Comments at p. 18.</p> <p>TURN Broadband Pilot PD Reply Comments at pp. 3-4.</p> <p>D.25-08-050 at p. 42, COLs 5, 29-32, OP 2.</p> <p>D.25-08-050 at p. 42, COL 3, OP 6.</p>	
<p><b><u>c. Subscriber Eligibility</u></b></p> <p>TURN recommended at a minimum, the Commission should use the existing California LifeLine eligibility criteria and consider expanding it, such using a more expansive metric for income eligibility. In response to the Proposed Decision applying the one per</p>	<p>TURN Broadband Report Opening Comments at pp. 7-8.</p>	

<p>household rule to the Home Broadband Pilot, TURN recommend that the Commission modify the Proposed Decision to clarify that Pilot subscribers sharing the same address could each remain eligible for the Pilot or LifeLine by filling out the household economic worksheet.</p> <p>The Commission decided to use the established California LifeLine eligibility criteria for the Home Broadband Pilot. D.25-08-050 did not provide clarification on the use of the household economic worksheet, but TURN's work raised an important administrative question for the Commission to consider.</p> <p><b><u>d. Marketing Requirements</u></b></p> <p>In response to providers' advocacy to limit them, TURN defended Home Broadband Pilot advertising requirements for participating providers, highlighting the general lack of awareness of the California LifeLine program. TURN also defended the requirement for service providers to warn standalone broadband customers about a lack of access to 911 from Charter's advocacy against it. TURN further recommended a requirement similar to one in the ACP pilot where providers were required to collect a phone number from standalone broadband subscribers.</p> <p>Ultimately, the Commission decided to require participating service providers to notify households of their affordable internet plans and submit a marketing plan with example materials to the Communication Division for review. The Commission did not require Home Broadband Pilot service providers to collect phone numbers of standalone broadband subscribers but did require providers to inform subscribers that standalone broadband plans do not include voice service for 911 access.</p> <p><b><u>e. Provider Filings</u></b></p> <p>TURN recommended that the Commission should require service providers participating in</p>	<p>TURN Broadband Pilot PD Opening Comments at pp. 8-9.</p> <p>D.25-08-050 at p. 18, FOF 19.</p> <p>TURN Broadband Report Reply Comments at pp. 18-19. TURN Broadband Pilot PD Reply Comments at p. 5.</p> <p>D.25-08-050 at p. 28, COLs 16-19.</p>	
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<p>the Home Broadband Pilot to submit an advice letter with information about service offerings in order for those plans to be eligible for pilot subsidies. Specifically, TURN recommended that this type of advice letter should include information on the plan's minimum speed, data allowance, and information on included, additional services or benefits, and an accounting of costs and subsidies.</p> <p>D.25-08-050 requires providers wanting to participate in the Home Broadband Pilot to submit a Tier 2 advice letter that lists "all internet service plans and bundles that meet the minimum service standards including details of any promotional plan pricing that is scheduled to increase at a set interval."</p>	<p>TURN Broadband Report Opening Comments at p. 9.</p> <p>D.25-08-050 at pp. 32-33, OP 2.</p>	
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<p><b><u>7. Foster Youth Pilot Introduction</u></b></p> <p>The Commission first authorized a California LifeLine pilot program dedicated to serving California's foster youth since May 2019, when it authorized the iFoster Pilot. The iFoster Pilot ran until July 31, 2024, when it was replaced by the current Foster Youth Pilot.</p> <p>The Foster Youth Pilot differed in some details from the iFoster Pilot in terms of eligibility, the participating service provider, and third-party administrator (TPA). The Foster Youth Pilot differs from the main California LifeLine program in many key respects. Unlike the California LifeLine program, the Foster Youth Pilot supports only wireless service, provides phones (devices) to subscribers, and upon inception was available only to youth currently in foster care. When launched, the Foster Youth Pilot also had no requirements for renewing eligibility or rules regarding disconnection for non-usage of service.</p> <p>In February 2025, Youth Law Center (YLC) filed a Petition for Modification (PFM) to modify the decision authorizing the Foster Youth Pilot, in which it requested changes to the Pilot rules to expand eligibility and better align the program with the Foster Youth Bill of Rights and realities of the foster care system.</p> <p>The Commission solicited party comment on the petition and issued a staff proposal and proposed decision before voting out a final decision that enacted changes to the Foster Youth Pilot rules recommended by TURN and YLC.</p>		
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<p><b><u>7.1 A Non-Usage Rule</u></b></p> <p>During the development of the Foster Youth Pilot, TURN had advocated for a non-usage rule or policy of downgrading service for inactive subscribers, as the prior iFoster Pilot had no service usage requirements and saw a large number of consistently inactive lines—service that the California LifeLine fund was paying for and going unused. The Commission ultimately approved the Foster Youth Pilot without a non-usage rule, citing the need to give staff the “flexibility to procure wireless service.” However, by the time of YLC’s Petition, the Foster Youth Pilot had a service provider (TracFone/Verizon Value), and TURN repeated its prior recommendation that the Commission revisit the question of a non-usage rule when the Foster Youth Pilot was more established.</p> <p><b><u>a. Triggering Period of Inactivity</u></b></p> <p>TURN recommended that the Commission and parties use usage data from the Foster Youth Pilot to determine an appropriate non-usage rule. However, for a significant period of the Commission’s consideration of the YLC PFM, delays in distributing activated devices to subscribers were resulting in falsely high rates of non-usage.</p> <p>In the Staff Proposal, Staff proposed that subscribers inactive for 90 days be de-enrolled from the Foster Youth Pilot. This was shorter than the 6-month period of inactivity TURN had previously contemplated, but Staff also proposed measures that would facilitate re-enrollment of previously de-enrolled subscribers, which TURN supported as striking an appropriate balance between maintaining service and de-enrolling inactive subscribers.</p> <p>In D.25-10-025, the Commission enacted a non-usage rule that would result in termination</p>	<p>D.24-05-003 at pp. 21-22.</p> <p>Response of TURN to the PFM of YLC to Modify D.24-05-003 (TURN YLC PFM Response) (Mar. 26, 2025), at pp. 4-5.</p> <p>TURN YLC PFM Response at p. 5.</p> <p>Opening Comments of TURN on the ALJ’s Ruling Admitting Staff Proposal (TURN YLC PFM Staff Proposal Opening Comments) (June 27, 2025) at pp. 2-3. <i>See</i> D.24-05-003 at p. 21.</p> <p>D.25-10-025 at p. 26, FOF 9, COL 3, OP 2.</p>	
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<p>of service for a Foster Youth Pilot subscriber on their 91<sup>st</sup> day of inactivity.</p> <p><b><u>b. Outreach to Inactive Subscribers</u></b></p> <p>In response to the Staff Proposal's recommended non-usage rule and proposal for TPA outreach to inactive subscribers, TURN recommended that the TPA use multiple methods of contacting inactive subscribers when possible, such as e-mail, and not just outreach reliant on a subscriber's device, which could be lost or broken, resulting in that subscriber losing their service. TURN also recommended that TPA outreach include instructions on how to request a replacement device.</p> <p>In D.25-10-025, the Commission adopted TURN's recommendations.</p>	<p>TURN YLC PFM Staff Proposal Opening Comments (June 27, 2025) at pp. 2-3.</p>	
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<p><b><u>7.2 Expanding Pilot Eligibility to Former Foster Youth</u></b></p> <p>As part of its PFM, YLC advocated that the Commission expand Foster Youth Pilot eligibility to allow former foster youth under the age of 21 to remain eligible in the pilot if they had previously been in care when they were 13 or older. As support for this recommendation, YLC cited a University of Chicago study on foster-care re-entry and the expertise of its executive director.</p> <p>TURN supported this recommendation and in its response to YLC's PFM, TURN presented its own complementary analysis of California foster care statistics and other studies of foster care re-entry to support expanding eligibility. TURN also argued that maintaining eligibility would be more efficient for all parties in cases where subscribers re-entered foster care. Moreover, TURN reviewed Foster Youth Pilot enrollment statistics, enrollment in the prior iFoster Pilot, and the Foster Youth Pilot's unofficial enrollment goals to determine that expanding eligibility would not immediately trigger budgetary concerns.</p> <p>In D.25-10-025, the Commission expanded Foster Youth Pilot eligibility to include former foster youth under age 21 who were in foster care on or after their 13th birthday.</p>	<p>Petition of YLC to Modify D.24-05-003 (Feb. 24, 2025), at pp. 7-9.</p> <p>TURN YLC PFM Response at pp. 1-4.</p> <p>D.25-10-025 at pp. 10-11, COL 1, OP 1.</p>	
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<p><b><u>7.3 The One Benefit Per Household Rule</u></b></p> <p>In its opening comments on the Foster Youth Staff Proposal, YLC raised concerns with the application of the California LifeLine program's one benefit per household rule to households in cases where multiple siblings enrolled in the Foster Youth Pilot exit care to reunify with their parents. Because the Foster Youth Pilot was now poised to expand eligibility to <i>former</i> foster youth, the Commission needed to consider the implications of the standard one benefit per household rule to this type of scenario. TURN provided additional analysis explaining that the household economic worksheet, which is used to allow for multiple lines of LifeLine-supported service at the same address when each belongs to a <i>separate household</i>, would not be a solution for reunified families, who would presumably be one household sharing resources. Therefore, TURN recommended that the Commission waive the one benefit per household rule for the Foster Youth Pilot to prevent the unintentional creation of disincentives for otherwise feasible family reunification. TURN also advocated for the Commission to waive the one per household rule so that the same household could participate in both California LifeLine and the Foster Youth Pilot, highlighting that low-income families are disproportionately involved in the child welfare system and therefore disproportionately eligible for LifeLine.</p> <p>The Commission adopted TURN's specific recommendation to waive the one benefit per household rule for Foster Youth Pilot subscribers for the duration of the Foster Youth Pilot. However, the Commission determined that allowing the same household to simultaneously participate in the California LifeLine program and Foster Youth Pilot would be a waiver of the Moore Act's statutory requirements for the permanent California LifeLine program, which it could not do.</p>	<p>YLC PFM Staff Proposal Opening Comments (June 27, 2025) at pp. 4-5.</p> <p>TURN PFM Staff Proposal Reply Comments (July 11, 2025), at pp. 1-3.</p> <p>D.25-10-025 at pp. 9-10, 32-33, COL 2, OP 2.</p>	
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<p><b><u>7.4 Database Eligibility Verification of Foster Youth Pilot Applicants</u></b></p> <p>TURN supported a recommendation in the Foster Youth Staff Proposal for the Commission to enter data sharing agreements with California Department of Social Services databases to facilitate eligibility verification of Foster Youth Pilot applicants. These data sharing agreements would be an alternative to the then-accepted forms of eligibility verification, ward of court and county dependency letters. In its opening comments, TURN supported this recommendation and provided additional context and statistics on database matching agreements in the California LifeLine program and their positive impact on the enrollment and renewals processes.</p> <p>In D.25-10-025, the Commission agreed with TURN that database matching would be a reasonable alternative method of verifying eligibility for Foster Youth Pilot applicants and adopted decisions to the Foster Youth Pilot rules that would allow through verification through “an established database match.”</p>	<p>TURN PFM Staff Proposal Reply Comments at pp. 3-4.</p> <p>D.25-10-025 at pp. 14-15 (“Here, we agree with TURN and Staff that . . . developing a limited database matching agreement with CDSS are reasonable alternatives to the ward of court and county dependency letters.”), COL 1, OP 1.</p>	
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<p><b><u>7.5 Maintaining Caregiver-Initiated Enrollment for Minor Foster Youth</u></b></p> <p>The Foster Youth Staff Proposal Proposed redlines to D.24-05-003 to effectuate many of the recommendations in YLC's Petition for Modification. However, TURN noticed that some of these proposed redlines would remove "Authorized Applicants" as parties who can submit Foster Youth Pilot applications for minor foster youth, effectively eliminating caregiver-initiated applications as a way for minor foster youth to apply, which appeared contrary to the goals of the Petition for Modification and Foster Youth Staff Proposal. Instead, TURN recommended alternative language based on prior YLC-recommended terminology that would expand minor foster youth's options for applying to the Foster Youth Pilot.</p> <p>In D.25-10-025, the Commission modified the Foster Youth Pilot rules to expand the people who could sign a Foster Youth Pilot application on behalf of a minor foster youth without eliminating the option for caregiver-initiated applications.</p>	<p>TURN PFM Staff Proposal Opening Comments at pp. 1-2. <i>See also</i> TURN PFM Staff Proposal Reply comments at p. 4.</p> <p><i>See</i> D.25-10-025 at p. 19, COL 1, OP 1.</p>	
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<p><b><u>7.6 Giving Pilot Subscribers the Ability to Transition to California LifeLine when They Turn 18</u></b></p> <p>The Foster Youth Staff Proposal recommended that Foster Youth Pilot subscribers have the option to enroll in California LifeLine when they turn 18. TURN provided additional analysis and policy rationales to support this option, including the fact that non-minor foster youth would have a greater choice of service providers in the California LifeLine program. Moreover, as California LifeLine subscribers, non-minor foster youth and former foster youth would also be eligible for federal Lifeline subsidies.</p> <p>D.25-10-025 adopted this recommendation and expressly noted TURN's analysis about additional choices of service providers.</p>	<p>TURN PFM Staff Proposal Opening Comments at p. 3.</p>	
<p><b><u>8. Modifications to GO 153 Introduction</u></b></p> <p>In October 2025, the Commission issued a proposed decision to update GO 153, the general order codifying the California LifeLine rules, pursuant to prior Commission decisions. At that point, Commission had most recently modified GO 153 in September 2021, and in the intervening years, the Commission had issued other decisions affecting the LifeLine program rules, such as the changes to the registration framework for VoIP providers in D.24-11-003 and the Universal Service Public Purpose Program surcharge reporting and remitting requirements in D.22-10-021.</p>		

<p><b><u>8.1 VoIP Providers Participating in LifeLine as Wireline Providers</u></b></p> <p>In its opening comments, TURN noted that the GO 153 Proposed Decision and accompanying redlines to GO 153 would state that VoIP providers were required to have a Certificate of Public Convenience and Necessity (CPCN) when in fact the new VoIP registration framework requires non-facilities-based providers of interconnected fixed VoIP to obtain Section 1013 operating authority in the form of a VoIP provider-specific designation. TURN recommended changes to GO 153 modifying the language used to describe the possible forms of VoIP providers' operating authority.</p> <p>Relatedly, in its opening comments, Charter raised the fact that some VoIP providers had been participating in LifeLine as wireline providers and that the redlines in the GO 153 Proposed Decisions would create confusion as to what set of LifeLine service elements those providers must offer to their LifeLine subscribers. Charter recommended that VoIP providers be required to offer the wireline LifeLine service elements instead.</p> <p>TURN, co-writing with CforAT, disagreed, and highlighted certain elements of wireline LifeLine service that VoIP providers may be unable to offer due to differences in underlying technology and VoIP-specific metrics VoIP providers were required to report. Instead, TURN recommended that the Commission allow VoIP providers participating in LifeLine as wireline providers to continue doing so.</p> <p>In D.25-11-008, the Commission updated GO 153 to specify that VoIP providers without a CPCN would continue to be required to provide the VoIP-specific service elements.</p>	<p>TURN GO 153 PD Opening Comments (Nov. 4, 2025) at pp. 1-2.</p> <p>Charter GO 153 PD Opening Comments (Nov. 4, 2025), at pp. 3-6.</p> <p>TURN GO 153 PD Reply Comments (Nov. 10, 2025), at pp. 1-3.</p> <p>D.25-11-008, Appendix A, § 7.2, Appendix B.</p>	
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<p><b><u>8.2 Description of initiating LifeLine service</u></b></p> <p>The GO 153 Proposed Decision would have updated the definition of a LifeLine “Application Date” to “The date a new or existing Customer communicates verbally with his/her California LifeLine Service Provider and requests LifeLine Service.” TURN pointed out in its opening comments that this language too narrowly described the way LifeLine applicants may request service, as the Commission is creating a new enrollment pathway for applicants without Social Security Numbers (SSNs) that would not begin with service providers, and some providers accept California LifeLine applications through their websites. TURN proposed its own updated definition for “Application Date” as “The date a new or existing Customer requests LifeLine Service.”</p> <p>In response to comments by other parties, the Commission declined to adopt TURN’s specific recommendation, instead deciding that a change to the definition of “Application Date” required further record development. TURN raised important considerations regarding potential changes to the definition for this term, which the Commission may further examine when it considers future modifications to GO 153, which it may do as part of R.25-11-005.</p>	<p>TURN GO 153 PD Opening Comments at pp. 2-3.</p> <p>D.25-11-008 at p. 9.</p> <p><i>See OIR to Update the California LifeLine Program at p. 6 (preliminarily scoping the issue of “[u]pdating General Order 153 to reflect changes made through decisions issued in this proceeding, as well as to incorporate new technology, legislation, policies, and other developments.”).</i></p>	
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<p><b><u>8.3 Removing References to the Social Security Number Requirement</u></b></p> <p>In its opening comments, TURN noted that the proposed redlines to GO 153 did not modify portions of GO 153 that required applicants to provide SSNs, a requirement that had been eliminated in D.25-10-003. TURN recommended redlines to GO 153 to modify specific language stating or implying that SSNs are required to apply for or participate in LifeLine.</p> <p>The final version of D.25-11-008 implemented redlines that updated the language in GO 153 to no longer require SSNs in the sections TURN identified.</p> <p>Moreover, the final version of D.25-11-008 to include D.25-10-003 in the list of decisions and resolutions necessitating substantive changes to GO 153.</p>	<p>TURN GO 153 PD Opening Comments at pp. 3-4.</p> <p><i>See</i> D.25-11-008 at Appendix A, §§ 5.4.2.2, 5.12.4.</p> <p><i>Compare</i> GO 153 Proposed Decision (Oct. 15, 2025) at pp. 4-5 with D.25-11-008 at p. 5.</p>	
<p><b><u>8.4 Accuracy of Updated Hyperlinks</u></b></p> <p>The GO 153 Proposed Decision proposed redlines to update various hyperlinks that appeared in the text of GO 153. However, TURN noted in its opening comments that specific links led to a “Page not found” page on the Commission’s website.</p> <p>In D.25-11-008, the Commission updated these links so that they lead to the intended webpages.</p>	<p>TURN GO 153 PD Opening Comments at p. 4.</p> <p>D.25-11-008 at p. 11 (“This decision adopts the other party recommendations, including ensuring hyperlinks are active . . .”), Appendix A, §§ 5.9, 10.2.</p>	

<p><b><u>8.5 Decisions Superseding D.22-10-021</u></b></p> <p>In its opening comments, AT&amp;T recommended against the GO 153 Proposed Decision's added language of "and any subsequent decision or order superseding D.22-10-021" to Section 11.1.1 of GO 153. TURN, co-writing with CforAT, defended the addition of this language, noting that future updates to California LifeLine could take time to be reflected in GO 153 and that the language "any subsequent decision or order superseding D.22-10-021" could be important in preventing confusion.</p> <p>In D.25-11-008, the Commission added the language "any subsequent decision or order superseding D.22-10-021" to GO 153.</p>	<p>TURN GO 153 PD Reply Comments at pp. 3-4.</p> <p>D.25-11-008 at p. 11 ("We agree with TURN/CforAT that it is necessary to revise Section 11.1.1 to identify D.22-10-021 or any subsequent decision or order superseding D.22-10-021 as the authority for the decision."), Appendix A, § 11.1.1.</p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding? <sup>6</sup>	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: The Center for Accessible Technology (CforAT), Greenlining Institute (GLI), Cal Advocates, Youth Law Center (YLC), California Emerging Technology Fund (CETF)		
d. Intervenor's claim of non-duplication:  Because of the breadth of issues examined in this rulemaking, many parties, including other consumer advocates and public interest groups,		

<sup>6</sup> The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

	Intervenor's Assertion	CPUC Discussion
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>6</sup></b>	Yes	
<p>participated in various aspects of R.20-02-008. TURN made efforts to coordinate with these other parties to the extent its interests and positions aligned with theirs. This coordination and cooperation reduced the total cost of TURN's intervenor participation. When TURN did not work jointly with other parties, TURN leveraged its wide-ranging expertise in the California LifeLine program to present unique analysis, recommendations, and research for the Commission to consider. The fact that other parties shared TURN's perspective on various issues did not result in undue duplication with those parties. TURN argued in support of its independent perspective while supporting those of other intervenors, thereby contributing to a full record upon which the Commission could base its determinations in its final decisions.</p> <p>Both TURN and CforAT participated in the development of some of the final decisions represented in this claim; both organizations participated in the development of the SSA freeze, Home Broadband Pilot, and modifications to GO-153. As both groups are consumer advocates, concerns about affordable basic service for LifeLine subscribers and stewardship of LifeLine program funds guided both organizations' participation in this docket. However, at times TURN and CforAT recommended different approaches to address certain issues, and, as a result, decided to file separate comments to reflect those unique approaches. For example, TURN and CforAT both were concerned about how SSA Freeze Proposed Decision did not specify a timeline for the freeze and the impact an extended freeze could have on LifeLine subscribers. To address this concern, TURN proposed a two-year sunset to the freeze, and CforAT recommended that the Commission annually review the SSA and adjust it if needed.<sup>7</sup> As another example, both TURN and CforAT rebutted arguments regarding the technology neutrality of the Home Broadband Pilot, but TURN pointed out that the main California LifeLine program supported wireless service, and CforAT cited to Commission precedent on the concept of technology neutrality.<sup>8</sup> For TURN and CforAT's joint reply comments on the Proposed Decision modifying GO 153, TURN and CforAT jointly decided upon positions and which issues to prioritize, and</p>		

<sup>7</sup> Compare TURN Proposed Decision Opening Comments (Nov. 21, 2024) at pp. 1, 3. with CforAT Proposed Decision Comments (Nov. 21, 2024) at pp. 1-2.

<sup>8</sup> Compare TURN Broadband Pilot PD Reply Comments at pp. 2-3 with CforAT Reply Comments on Proposed Decision Approving Home Broadband Pilot (Aug. 19, 2025) at pp. 3-4.

	Intervenor's Assertion	CPUC Discussion
<p><b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>6</sup></b></p>	Yes	
<p>TURN was the main drafter of the filing, with CforAT providing review and feedback.</p> <p>TURN and GLI worked jointly on the 2022 Program Assessment reply comments included in this compensation claim. In this case, TURN was the lead drafter on the issues covered, with GLI providing review and feedback.</p> <p>Cal Advocates is a party to this proceeding but did not participate in the development of every decision represented in this compensation claim. For example, Cal Advocates did not weigh in on the SSA freeze or proposed modifications to the Foster Youth Pilot or GO 153. In areas where both TURN and Cal Advocates participated, the two groups often had different recommendations and approaches. For example, both TURN and Cal Advocates supported the creation of the Home Broadband Pilot. TURN made additional efforts to defend the idea of a broadband subsidy pilot by rebutting other parties' characterizations of the Home Broadband Adoption Report and arguments about the state of broadband availability, while Cal Advocates recommended mandating a low-income plan from internet service providers operating in California and presented analysis of the costs of doing so.<sup>9</sup> For another example, TURN and Cal Advocates both commented on the 2023 SSA and MSS Staff Proposal, but TURN conducted unique data analysis to support its recommendations. TURN and Cal Advocates sought opportunities to coordinate or work together where their interests and proposed solutions aligned, such as jointly filing the petition to modify D.20-10-006.</p> <p>YLC participated in this proceeding only on matters concerning the Foster Youth Pilot. YLC's and TURN's work on Foster Youth Pilot issues was complementary, with YLC using its expertise in the foster care system and related law to make recommendations on pilot program modifications, and TURN contributing its expertise on the California LifeLine program and prior iFoster Pilot to make recommendations about how to address administrative issues or ways to implement YLC's proposed modifications. For example, as discussed in the Substantial Contribution section, YLC noted concerns about continuing Foster Youth Pilot</p>		

<sup>9</sup> Compare TURN Broadband Report Reply Comments at pp. 1-2, 6-10, 13-14 with Opening Comments of Cal Advocates on the Assigned Commissioner's Ruling Requesting Comments on Strategies to Address the Home Broadband Gap (May 16, 2025), at pp. 2-3, Attachment A.

Intervenor's Assertion	CPUC Discussion
<p><b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>6</sup></b></p>	<p>Yes</p>
<p>eligibility for siblings reunifying with their parents; TURN recommended that the Commission address this issue by waiving the one per household rule for the Foster Youth Pilot. TURN and YLC also coordinated on which substantive issues each organization would address in its filings.</p> <p>During the period covered in this compensation claim, CETF only participated in this docket on the Home Broadband Pilot. While both TURN and CETF both supported the adoption of the Home Broadband Pilot, TURN highlighted the benefits of connecting the subscription-vulnerable and rebutted of other parties' arguments and characterizations of the related staff report, and CETF provided unique support and insight as the sponsor of relevant legislation (SB 716).<sup>10</sup></p>	

**C. Additional Comments on Part II: *(use line reference # or letter as appropriate)***

#	Intervenor's Comment	CPUC Discussion

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**  
*(to be completed by Intervenor except where indicated)*

**A. General Claim of Reasonableness (§ 1801 and § 1806):**

CPUC Discussion
<p><b>a. Intervenor's claim of cost reasonableness:</b></p> <p>TURN's request for intervenor compensation seeks an award of approximately \$120,295.63 as the reasonable cost of TURN's participation in the proceeding.</p>

<sup>10</sup> Compare TURN Broadband Report Opening Comments at pp. 2-4 and TURN Broadband Report Reply Comments at pp. 1-2, 6-10, 13-14 with Comments of CETF on Proposed Decision Requesting Comments on the Home Broadband Adoption Pilot on R.20-02-008 (Aug. 14, 2025) at pp. 1-2.

CPUC Discussion
<p>The savings to LifeLine surcharge-payers exceeds the cost of TURN’s participation in the development of the SSA freeze. Had the freeze not taken effect, the SSA would have increased in 2025 from \$19 to \$20.65 per month, or an increase in expenditures of \$1.65 per LifeLine subscriber per month (see Attachment 4).</p> <p>LifeLine subscribership varies from month to month, but it tends to increase. Multiplying the January 2025 LifeLine subscribership (1,659,822 subscribers – see Attachment 5) by the \$1.65 in avoided SSA increases yields a savings of at least \$2,738,706.30 per month for up to 24 months. At time of filing, the SSA freeze has been in effect for one year, meaning the SSA freeze has resulted in a savings of at least \$32,864,475.60 for surcharge payers.</p> <p>The benefits of TURN’s participation on other issues, as is often the case for telecommunications proceedings in recent years, is more difficult to quantify, as it does not pertain to rates, subsidies, or surcharges. On these issues, TURN’s advocacy helped achieve an outcome with clear and substantial benefits to Californians in AT&amp;T’s service territory, though hard to quantify. It is hard, if not impossible, to attach a monetary amount to the value of a former foster youth being able to apply for their first job through their Foster Youth Pilot device, or the children of a low-income household being able to do their homework at home instead of in a fast food restaurant’s parking lot<sup>11</sup> because the Home Broadband Pilot has made home internet affordable for their family. In this proceeding, TURN worked to expand the California LifeLine program—both main program offerings and pilot programs—while keeping surcharges affordable through its advocacy. TURN’s work directly contributed to the development of one pilot program, updates to another, updates to GO 153, a temporary change to the LifeLine SSA, the foundation for further updates to the program SSA and MSS.</p> <p>TURN strongly recommends that the Commission find TURN’s participation costs are reasonable, considering the benefits to both LifeLine subscribers and surcharge payers.</p>
<b>b. Reasonableness of hours claimed:</b>

<sup>11</sup> See, e.g., Alisha Ebrahimji, School sends California family a hotspot after students went to Taco Bell to use their free WiFi, CNN (Auh. 31, 2020), available at <https://www.cnn.com/2020/08/31/us/taco-bell-california-students-wifi-trnd>.

CPUC Discussion
<p>TURN's attorneys and advocates recorded a reasonable number of hours for their work in this proceeding. The total hours of professional time included in this compensation request (approximately 297 hours of substantive work, exclusive of compensation-related work) is equivalent to more than six and a half weeks of full-time work by a single person. TURN's efforts covered work on the portions of our work on the November 2023 SSA and MSS Staff Proposal; portions of work responding to the 2022 Program Assessment; reply comments on the June 2024 ALJ Ruling regarding the SSA freeze; opening comments on the Proposed Decision freezing the SSA; a petition for modification that assisted in laying the foundation for the Home Broadband Pilot; two sets of opening and comments on the Home Broadband Pilot; a response to YLC's Petition for modification and two sets of opening and reply comments on modifications to the Foster Youth Pilot; and a set of opening and reply comments on revisions to GO 153.</p> <p>TURN extensively reviewed its claimed hours for this proceeding and withheld hours spent on work that is arguably compensable. This cut time includes internal and external coordination, time spent reviewing other parties' filings, and time spent on drafting intervenor compensation-related filings. The hours that TURN includes in this claim have a clear connection to TURN's substantial contribution to this docket.</p> <p>TURN seeks compensation for approximately 165 hours that Ashley L. Salas devoted to substantive issues in this proceeding. Until October 2025, Ms. Salas was TURN's lead attorney on California LifeLine issues except for the Foster Youth Pilot. During this period, Ms. Salas led all other aspects of TURN's work covered in this claim, including the development of TURN's strategy, drafting of pleadings, and communication and coordination with other parties.</p> <p>TURN seeks compensation for approximately 151.25 hours that Alexandra Green devoted to substantive issues in this proceeding. Until October 2025, Ms. Green was TURN's lead attorney on all matters and strategy related to the Foster Youth Pilot and assisted Ms. Salas with research, the drafting of TURN's filings, and the review of other parties' filings. After October 2025, Ms. Green became TURN's lead attorney on all California LifeLine issues and led TURN's strategy and issue development, the drafting of all pleadings, and coordination with other parties on other issues in addition to her ongoing work with the Foster Youth Pilot.</p> <p>TURN seeks compensation for approximately 3 hours that Leo Fitzpatrick devoted to substantive issues in this proceeding. Mr. Fitzpatrick assisted Ms. Salas in negotiating NDAs with LifeLine service providers to obtain</p>

	CPUC Discussion
information that TURN sought to use to inform its recommendations on LifeLine SSA and MSS.	
TURN seeks compensation for approximately 1.75 hours that Brenda D. Villanueva devoted to substantive issues in this proceeding. Mrs. Villanueva was TURN's Telecommunications Managing Attorney from the beginning of the period covered in this claim until late June 2023 and again from January 2024 to July 2024. As managing attorney, Mrs. Villanueva assisted Ms. Salas and Ms. Green with strategy development, coordination with other parties, and revisions to TURN filings.	
TURN seeks compensation for approximately 2 hours that Christine Mailloux devoted to substantive issues in this proceeding. Ms. Mailloux served as interim Telecommunications Managing Attorney from July 2024 to January 2025 and during that period drew upon her extensive experience in California LifeLine matters to review draft filings and work with Ms. Salas and Ms. Green on strategy development on the LifeLine issues where they were the respective leads.	
TURN seeks compensation for approximately 1 hour that Thomas Long devoted to substantive issues in this proceeding. Mr. Long served as interim Telecommunications Managing Attorney from January 2025 to June 2025. During this period, he consulted on strategy matters with Ms. Green regarding the Foster Youth Pilot and provided feedback on related pleadings.	
TURN seeks compensation for approximately 1.25 hours that Robert Finkelstein devoted to substantive issues in this proceeding. Mr. Finkelstein served as interim Telecommunications Managing Attorney from June 2025 to September 2025. During this period, Mr. Finkelstein worked with Ms. Green with strategy development on Foster Youth Pilot matters and provided feedback on related pleadings.	
TURN seeks compensation for approximately 1.5 hours that Kori Cordero devoted to substantive issues in this proceeding. Mx. Cordero became Telecommunications Managing Attorney in late September 2025. During the period covered by this claim, Mx. Cordero provided review and feedback on TURN's draft comments on the Commission's proposed revisions to GO 153.	
<b><u>SSA-, MSS- and Program Assessment-Related Work</u></b> In this claim, TURN seeks compensation for hours spent on work related to the California LifeLine SSA, MSS, and recommendations stemming from the 2022 Program Assessment, coded as SSA_MSS_WLESS,	

CPUC Discussion
<p>SSA_MSS_WLINE, SSA_SP, PRGASSESS, and approximately half of the hours coded as FED. The Commission did not issue final decisions on these issues before it closed R.20-02-008 and opened R.25-11-005, where these issues are already being examined or are preliminarily scoped. If the Commission does not find TURN’s claim for all hours in this proceeding to reasonably lead to a substantial contribution in R.20-02-008, TURN requests that the Commission not reject this compensation request out of hand or significantly reduce the hours eligible for compensation. Instead, TURN requests leave to submit claims for these hours in the new LifeLine Rulemaking, R.25-11-005.</p> <p>This category of hours <i>does not</i> include work on usage data analysis or recommendations for the MSS for the Foster Youth Pilot. TURN was awarded compensation for that work in D.24-11-020.</p> <p><b><u>Recurring LifeLine Stakeholder Meetings</u></b></p> <p>This compensation request includes claims for TURN’s participation in two types of recurring meetings: monthly meetings between the California LifeLine third-party administrator (TPA) and consumer advocates, and recurring meetings between TURN, YLC, the TPA, and Commission staff regarding the Foster Youth Pilot. As is often the case with LifeLine matters, these meetings are examples of instances where Commission staff, the TPA, and stakeholders exchanged information and discussed issues and implementation of Commission decisions informally.</p> <p>TURN used these meetings as an opportunity to ask clarifying questions and gather information used in our filings to support TURN’s recommendations and supplement the record.<sup>12</sup> TURN is not claiming all of these meetings or the entire duration of the meetings included in this claim but limiting claims to meetings that directly informed TURN’s participation in the matters represented in this compensation claiming.</p>

<sup>12</sup> See, e.g., TURN Broadband Report Opening Comments at p. 19 (“TURN recommends that the Commission iterate on the LifeLine customer portal it is developing for the general California LifeLine program to create a dedicated customer portal for a broadband pilot. Pilot subscribers should be able to register with the portal, apply for the pilot, and then select a participating provider.”); TURN PFM Staff Proposal Reply Comments at pp. 3-4; Reply Comments of TURN on the Proposed Decision Modifying Decision 24-05-003 (Oct. 6, 2025), at p. 1 (“It is TURN’s understanding that under the current Pilot processes, if a caregiver does not support a foster youth’s Pilot application or refuses to provide their signature, the application proceeds anyway—in keeping with foster youth’s right to access technology and the internet. Therefore, a caregiver signature or lack thereof has no practical effect.” (internal citations omitted)).

CPUC Discussion
<p><b><u>Meetings or Discussions Involving Multiple TURN Advocates</u></b></p> <p>A relatively small percentage of hours and hourly entries reflect internal and external meetings involving two or more of TURN's advocates or attorneys. In past compensation decisions, the Commission has deemed such entries as reflecting internal duplication that is not eligible for an award of intervenor compensation. This is not the case here. For the meetings that were among TURN's advocates and attorneys, such meetings are essential to the effective development and implementation of TURN's strategy for R.20-02-008. None of the attendees are there in a duplicative role – each is an active participant, bringing their particular knowledge and expertise to bear on the discussions. As a result, TURN can identify issues and angles that would almost certainly never come to mind but for the collaboration achievable in such settings. There were also meetings with other parties at which TURN was represented by more than one advocate on occasion. The Commission should understand that this is often essential in LifeLine work, which represents a wide range of complex and detailed issues that no single person is likely to master. TURN's requested hours do not include any entries for TURN advocates where their presence at a meeting was not necessary to achieve the meeting's purpose. TURN submits that such meetings can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts. For both internal and external meetings, TURN advocates on occasion did not stay for the entire meeting because of a schedule conflict. In past compensation decisions, the Commission has deemed such discrepancies in time entries as grounds to reduce all advocates' time for such meetings. This is not the case here. TURN submits that any time difference listed for internal or external meeting reflects the fact that an advocate could not stay for the entire length of the meeting due to a schedule conflict, which resulted in an advocate arriving late to a meeting or leaving early.</p> <p><b><u>Intervenor Compensation-Related Time</u></b></p> <p>TURN is requesting compensation for 29.75 hours that it devoted to the substantial preparation of this request for compensation. This is a reasonable number of hours given the size and scope of this request due to the number of final decisions represented in this claim and TURN's participation in their development. Moreover, TURN has voluntarily reduced a significant number of hours claimed for preparing a compensation request of this magnitude. In sum, the Commission should find that the number of hours claimed is entirely reasonable in light of the substantial contributions TURN made in R.20-02-008.</p>

			CPUC Discussion
<b>c. Allocation of hours by issue:</b>			
ACP_Pilot	<b>ACP Pilot</b> – research and advocacy related to the wind-down of the ACP pilot and compliance with D.23-06-003	1.18%	
AEVS	<b>Medi-Cal Automated Eligibility Verification System</b> – Information-gathering related to the LifeLine program’s data sharing with Medi-Cal for subscriber eligibility verification and renewals	0.59%	
CUSTPORT	<b>LifeLine Customer Portal</b> – Information-gathering related to the development of the online customer portals for LifeLine and Foster Youth Pilot subscribers	1.18%	
FED	<b>Federal Lifeline Subsidy</b> – work, research, and advocacy regarding California LifeLine’s alignment with the federal program to maximize eligibility for federal funding where possible and to make up for lost federal funding where needed to prevent second class service for subscribers.	3.03%	
FYP_APP	<b>Foster Youth Pilot: Applications</b> – Advocacy, work, and information-gathering related to proposed changes to the Foster Youth Pilot application process, including changes to the process for requesting replacement devices, and monitoring of the application process.	1.35%	
FYP_ELIG	<b>Foster Youth Pilot: Eligibility</b> – work and advocacy related to proposed changes to Foster Youth Pilot eligibility, eligibility documentation, and support for foster youth being able to transition to the main California LifeLine program when they become eligible at 18. Includes work/advocacy in support of database matching agreement to automate applicant eligibility verification.	3.28%	
FYP NON-USAGE	<b>Foster Youth Pilot: Non-Usage</b> – Analysis, advocacy, and information-gathering to support TURN’s	1.94%	

			CPUC Discussion
	recommendations regarding the implementation of a non-usage policy for the Foster Youth Pilot		
FYP_PFM	<b>Foster Youth Pilot: YLC Petition for Modification</b> – Work on TURN’s response to YLC’s Petition for Modification of D.24-05-003 that cannot be allocated to a more specific category.	0.42%	
FYP_PFMSP	<b>Foster Youth Pilot: PFM Staff Proposal</b> – Work on comments on the PFM Staff Proposal that cannot be allocated to a more specific category.	0.51%	
FYP_TRANSITION	<b>Foster Youth Program: Transition</b> – work, advocacy, and information gathering related to the transition from the iFoster Pilot to the Foster Youth Pilot that cannot be allocated to a more specific category.	3.54%	
FZ_AMT	<b>SSA Freeze: Amount</b> – Analysis and advocacy related to determining the amount at which to freeze the LifeLine SSA.	0.34%	
FZ_GO153	<b>SSA Freeze: GO 153</b> – Work and advocacy regarding modifications to GO 153 to implement the SSA freeze.	0.42%	
FZ_SUNST	<b>SSA Freeze: Sunset</b> – Analysis and advocacy related to determining the sunset date for the SSA freeze	0.42%	
FZ_WLESS/WLINE	<b>SSA Freeze: Wireless versus Wireline</b> – Analysis and advocacy regarding different treatment of the wireless and wireline SSAs.	0.76%	
GO153_APP	<b>General Order 153:</b> – Work related to recommended modifications to GO 153 regarding the Commission’s proposed modification to the term	0.34%	
GO153_LINKS	<b>General Order 153: Hyperlinks</b> – Work related to recommended modifications to GO 153 regarding hyperlinks included in proposed redlines.	0.17%	
GO153_PD	<b>General Order 153: Proposed Decision</b> – Work related to recommended modifications to GO 153 that cannot be allocated to a more specific category.	0.51%	

			CPUC Discussion
GO153_SSNT	<b>General Order 153: Social Security Numbers</b> – Work related to recommended modifications to GO 153 regarding language requiring Social Security Numbers.	0.42%	
GO153_SUP	<b>General Order 153: Decisions Superseding D.22-10-021</b> – Work related to recommended modifications to GO 153 regarding the Commission’s surcharge authority.	0.25%	
GO153_VOIP	<b>General Order 153: VoIP Issues</b> – Work related to recommended modifications to GO 153 regarding VoIP providers and their operating authority.	1.09%	
LLBBAND_DATA	<b>LifeLine Support for Standalone Broadband: Data</b> – work and advocacy related to determining data reporting requirements for service providers offering LifeLine-supported standalone broadband.	1.60%	
LLBBAND_DUR	<b>LifeLine Support for Standalone Broadband: Duration</b> – Analysis and advocacy regarding the duration of LifeLine support for standalone broadband.	2.61%	
LLBBAND_ELIG	<b>LifeLine Support for Standalone Broadband: Eligibility</b> – research and advocacy regarding consumer eligibility criteria for LifeLine-supported standalone broadband.	0.84%	
LLBBAND_MSS	<b>LifeLine Support for Standalone Broadband: MSS</b> – research and advocacy regarding the MSS for LifeLine-supported standalone broadband.	4.88%	
LLBBAND_PD	<b>LifeLine Support for Standalone Broadband: Proposed Decision</b> – Work on comments on the Home Broadband Pilot proposed decision that cannot be allocated to a more specific category.	1.26%	
LLBBAND_PFM	<b>LifeLine Support for Standalone Broadband</b> – TURN/Cal Advocates Petition for Modification – Work on the Petition for Modification of D.20-10-006 and TURN’s reply to other parties’	3.70%	

			CPUC Discussion
	responses to that Petition that cannot be allocated to a more specific category. This code includes ex parte work in support of the Petition.		
LLBBAND_PILOT	<b>LifeLine Support for Standalone Broadband: Home Broadband Pilot</b> – Work, research, and advocacy in support of the CPUC enacting a broadband pilot subsidy pilot, including addressing related legislative developments and defending the Commission's authority to enact a pilot.	4.29%	
LLBBAND_PROVIDER	<b>LifeLine Support for Standalone Broadband: Providers</b> – includes work and research around the question of whether the Commission could mandate provider participation in a pilot.	3.54%	
LLBBAND_SCHG	<b>LifeLine Support for Standalone Broadband: SurchARGE</b> – work and advocacy related to cost and funding issues related to LifeLine support of standalone broadband, including potential impact on the Public Purpose Program surcharge.	2.61%	
LLBBAND_SP	<b>LifeLine Support for Standalone Broadband: Staff Proposal</b> – Work on comments on the Home Broadband Adoption Report that cannot be allocated to a more specific category.	2.1%	
LLBBAND_SSA	<b>LifeLine Support for Standalone Broadband: SSA</b> – Work and advocacy regarding the appropriate monthly subsidy amount for standalone broadband service	2.02%	
MSS	<b>LifeLine Minimum Service Standards</b> – Work generally defending California LifeLine minimum service standards, as opposed to allowing LifeLine to become a discount on retail plans	2.36%	
PRGASSESS	<b>Program Assessment</b> – Work on comments on the LifeLine Program Assessment that cannot be allocated to a more specific category.	0.67%	

			CPUC Discussion
SSA_AFFORD	<b>SSA Affordability</b> – work, advocacy, and analysis related to keeping co-payments affordable for LifeLine subscribers	3.37%	
SSA_MSS_WLESS	<b>Wireline SSA &amp; MSS</b> – work, advocacy, and data analysis regarding the SSA and MSS for wireline LifeLine service. Includes related discovery work, including related data requests to wireline providers.	22.9%	
SSA_MSS_WLINE	<b>Wireless SSA &amp; MSS</b> – work, advocacy, and data analysis regarding wireless LifeLine service. Includes related discovery work, including data requests to wireless providers.	8.08%	
SSA_SP	<b>SSA &amp; MSS Staff Proposal</b> – Work on comments on the November 2023 SSA and MSS Staff Proposal that cannot be allocated to a more specific category.	5.3%	
TRIBAL	<b>Tribal Participation</b> – outreach to Tribal contacts, work, and advocacy on measures to encourage Tribal participation in the California LifeLine program and Home Broadband Pilot.	2.61%	
Coord	<b>Coordination</b> – time spent strategizing, coordinating, and communicating with other organizations that cannot easily be allocated to a specific issue.	3.54%	
<b>TOTAL</b>		<b>100%</b>	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ashley Salas, TURN Attorney	2022	15.5	\$415	D.23-04-020	\$6,432.50			
Ashley Salas,	2023	6.5	\$455	D.24-09-018	\$2,975.50			

CLAIMED						CPUC AWARD		
TURN Attorney								
Ashley Salas, TURN Attorney	2024	106.5	\$475	D.24-09-018	\$50,587.50			
Ashley Salas, TURN Attorney	2025	36	\$515	D.25-07-029	\$18,540.00			
Alexandra Green, TURN Attorney	2023	2.5	\$220	D.24-09-018	\$550.00			
Alexandra Green, TURN Attorney	2024	57.5	\$240	D.24-09-018	\$13,800.00			
Alexandra Green, TURN Attorney	2025	62	\$275	D.25-05-025	\$17,050.00			
Leo Fitzpatrick, TURN Telecom. Policy Analyst	2024	3	\$325	D.25-01-024	\$975.00			
Brenda D. Villanueva, TURN Telecom. Managing Attorney	2024	1.75	\$505	D.24-11-020	\$883.75			
Christine Mailloux, TURN Telecom. Managing Attorney	2024	2	\$770	D.25-01-052	\$1,540.00			

CLAIMED						CPUC AWARD					
Thomas Long, TURN Director of Legal Strategy & Interim Telecom. Managing Attorney	2025	1	\$885	Res. ALJ-393, 2024 Rate plus 3.46% COLA (See Comment 1)	\$885.00						
Robert Finkelstein, TURN General Counsel & Interim Telecom. Managing Attorney	2025	1.25	\$905	Res. ALJ-393, 2024 rate plus 3.46% COLA (See Comment 2)	\$1,131.25						
Kori Cordero, TURN Telecom. Managing Attorney	2025	1.5	\$500	Res. ALJ-393 (See Comment 3).	\$750.00						
<i><b>Subtotal: \$ 116,082.50</b></i>						<i><b>Subtotal: \$</b></i>					
<b>OTHER FEES</b>											
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
[Person 1]											
[Person 2]											
<i><b>Subtotal: \$ 0</b></i>						<i><b>Subtotal: \$</b></i>					
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
Ashley Salas, TURN Attorney	2025	.5	\$257.50	Half of 2025 rate.	\$128.75						

CLAIMED						CPUC AWARD					
Alexandra Green, TURN Attorney	2025	24.25	\$137.50	Half of 2025 rate.	\$3,334.38						
Alexandra Green, TURN Attorney	2026	5	\$150.00	Half of 2026 requested rate (See Comment 4).	\$750.00						
<i><b>Subtotal: \$ 4,213.13</b></i>						<i><b>Subtotal: \$</b></i>					
<b>COSTS</b>											
#	Item	Detail			Amount	Amount					
1.											
2.											
<i><b>Subtotal: \$ 0</b></i>						<i><b>Subtotal: \$</b></i>					
<i><b>TOTAL REQUEST: \$ 120,295.63</b></i>						<i><b>TOTAL AWARD: \$</b></i>					

\*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

\*\*Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

#### ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR <sup>13</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Ashley L. Salas	December 2015	308374	No
Alexandra Green	December 2022	346771	No
Brenda D. Villanueva	January 2021	334217	No
Christine Mailloux	December 1993	167918	No
Thomas J. Long	December 1986	124776	No
Robert Finkelstein	June 1990	146391	No

<sup>13</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

CLAIMED		CPUC AWARD	
Kori Cordero	March 2017	314319	No

**C. Attachments Documenting Specific Claim and Comments on Part III:  
(*Intervenor completes; is not attached to final Decision*)**

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheet for TURN's Advocates
Attachment 3	TURN Hours Allocated by Issue
Attachment 4	Commission Notice of Specific Support Calculation for 2025
Attachment 5	LifeLine Active Subscriber Statistics (January 1, 2025)
Attachment 6	Résumé of Kori Cordero
Comment 1	<p><u>2025 Rate for Thomas J. Long</u></p> <p>For Mr. Long's work in 2025, TURN requests that the Commission adjust his authorized 2024 rate of \$860 (D.24-09-016) by applying the annual escalation adjustment authorized by Resolution ALJ-393 for 2025 of 3.46%. TURN uses a 2025 rate of \$885 to prepare this claim.</p>
Comment 2	<p><u>2025 Rate for Robert Finkelstein</u></p> <p>TURN requests an hourly rate of \$905 for work conducted by TURN General Counsel Robert Finkelstein in 2025. The requested rate is equal to the rate authorized by the Commission in D.24-07-033 for Mr. Finkelstein's work in 2024, \$875, adjusted by the 2025 escalation rate of 3.46%. Calculation: <math>\\$875 \times [1.0346 (\text{COLA})] = \\$905.28</math>, rounded to \$905.</p>
Comment 3	<p><u>2025 Rate for Kori Cordero</u></p> <p>This is TURN's first request for an hourly rate for TURN Telecom Advocacy Managing Attorney Kori Cordero. TURN accordingly presents the full justification required by Resolution ALJ-393 for a new market rate for Mx. Cordero and provides Mx. Cordero's resume as Attachment 6 to this claim.</p> <p><b>Intervenor Representative:</b> Kori Cordero  <b>Labor Role:</b> Legal - Attorney  <b>Level:</b> III  <b>2025 Hourly Rate Range:</b> \$376.79 - \$586.51</p>

Attachment or Comment #	Description/Comment
	<p><b>Requested Hourly Rate:</b> \$500 <b>Current Resume:</b> See Attachment 6. <b>Justification for the Requested Hourly Rate:</b></p> <p>Kori Cordero is an attorney with more than a decade of law and policy experience, primarily focused on Tribal matters, including but not limited to telecommunications, energy, and environmental issues impacting Tribes. They received their JD from UCLA School of Law in 2014 and Bachelor of Arts in Political Science from UC Riverside in 2010. Mx. Cordero was admitted to the Pascua Yaqui Bar in 2013, the California Bar in March 2017, and subsequently, the Yurok Tribal Bar.</p> <p>In September 2025, Mx. Cordero joined TURN as TURN's Telecom Advocacy Managing Attorney, where they represent TURN in telecommunications proceedings before the Commission and oversee TURN's telecommunications regulatory practice. Mx. Cordero arrived at TURN with significant expertise around utility regulatory and environmental issues. Mx. Cordero's prior experience encompassed, in pertinent part, providing legal advice to tribal governments and tribal corporations related to the California Environmental Quality Act, energy projects, utility rights of way, utility company land transactions and negotiations with utility entities; advising the U.S. Environmental Protection Agency on Tribal issues; serving as Associate and Deputy General Counsel for the Yurok Tribe and outside counsel for several Yurok Tribal owned corporations, including the Yurok Telecommunications Corporation, and even a short stint as the Chief Executive Officer of Yurok Telecommunications Corporation.</p> <p>When Mx. Cordero joined TURN in September 2025, Mx. Cordero had been licensed by the California bar for 8 ½ years. The Market Rate Study Hourly Rate Chart, as clarified by Resolution ALJ-393, instructs that an Attorney in Level III should have a JD or equivalent degree, 5-10 years of experience, and be licensed to practice law by any jurisdiction within the United States. The Hourly Rate Chart further suggests, "Higher experience levels should have experience with areas of law and procedures relevant to CPUC matters, such as environmental law or utility regulation." Mx. Cordero satisfies all of these requirements. They are an experienced litigator with specific knowledge of utility regulation, telecommunications law and policy issues, and energy and environmental issues. Because their employment history has extended beyond those topics most germane to Commission practice, TURN is conservatively requesting a rate only slightly above the midpoint of the market rate range established in Res. ALJ-393 for an Attorney - Level III, which is \$480.91 for 2025. TURN</p>

Attachment or Comment #	Description/Comment
	submits that the requested rate of \$500 is reasonable for Mx. Cordero's work in 2025.
Comment 4	<p><u>2026 Rate for Alexandra Green</u></p> <p>TURN requests an hourly rate of \$300 for TURN Attorney Alexandra Green in 2026. The requested rate is equal to the rate authorized by the Commission in D.25-05-025 for Ms. Green's work in 2025, \$275, adjusted by both (1) an estimated escalation rate of 3.3% for 2026, and (2) the first 5% step increase in the Attorney – Level II experience tier.</p> <p>Calculation: <math>\\$275 \times [1.033 \text{ (est. COLA)} + 0.05 \text{ (step increase)}] = \\$297.83</math>, rounded to \$300</p> <p>TURN uses an estimated escalation rate of 3.3% because it is the percentage change in the Bureau of Labor Statistics Employment Cost Index (ECI), Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations" for the 12-months ended Sept. 2025, which is the latest information available to TURN. TURN asks the Commission to apply the adopted escalation rate in determining Ms. Green's 2026 hourly rate.</p> <p>Res. ALJ-393 permits intervenor representatives to claim up to two 5% annual "step increases" within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). The maximum approved rate for an Attorney – Level II is \$453.79 for work conducted in <u>2025</u>. The requested 2026 rate for Alexandra Green of \$300 is well below the cap.</p>

**D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)**

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**  
**Within 30 days after service of this Claim, Commission Staff**  
**or any other party may file a response to the Claim (see § 1804(c))**

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

<b>Party</b>	<b>Reason for Opposition</b>	<b>CPUC Discussion</b>

<b>B. Comment Period: Was the 30-day comment period waived</b> <b>(see Rule 14.6(c)(6))?</b>	
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If not:

<b>Party</b>	<b>Comment</b>	<b>CPUC Discussion</b>

*(Green items to be completed by Intervenor)*

**FINDINGS OF FACT**

1. The Utility Reform Network [has/has not] made a substantial contribution to D.24-12-006.
2. The requested hourly rates for The Utility Reform Network's representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$ \_\_\_\_\_.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. The Utility Reform Network is awarded \$ \_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay The Utility Reform Network the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, electric] revenue data shall be used."] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of The Utility Reform Network's request, and continuing until full payment is made.]
3. The comment period for today's decision [is/is not] waived.

This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**APPENDIX**  
**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.24-12-006, D.25-06-003, D.25-08-050, D.25-10-025, D.25-11-008, and the implementation of D.23-06-003.		
Proceeding(s):	LifeLine Rulemaking (R.20-02-008)		
Author:			
Payer(s):			

**Intervenor Information**

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	01/23/2026	\$120,295.63		N/A	

**Hourly Fee Information**

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ashley	Salas	Attorney	\$415	2022	
Ashley	Salas	Attorney	\$455	2023	
Ashley	Salas	Attorney	\$475	2024	
Ashley	Salas	Attorney	\$515	2025	
Alexandra	Green	Attorney	\$220	2023	
Alexandra	Green	Attorney	\$240	2024	
Alexandra	Green	Attorney	\$275	2025	
Alexandra	Green	Attorney	\$300	2026	
Leo	Fitzpatrick	Advocate	\$325	2024	
Brenda	Villanueva	Attorney	\$505	2024	
Christine	Mailoux	Attorney	\$770	2024	
Thomas	Long	Attorney	\$885	2025	

Revised March 2023

Robert	Finkelstein	Attorney	\$905	2025	
Kori	Cordero	Attorney	\$500	2025	

**(END OF APPENDIX)**

**Attachment 1**  
**Certificate of Service**

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))  
(Served electronically as a separate document pursuant to Rule 1.10(c))

Revised March 2023

**Attachment 2**  
Timesheet for TURN's Advocates

**R.20-02-008 (LifeLine) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Alexandra Green	R20-02-008	SSA_SP	(SSA Staff Proposal Opening Comments) review and issue spot staff SASS proposal	11/17/23	0.25
Alexandra Green	R20-02-008	SSA_SP	(SSA Staff Proposal Opening Comments) prepare for 12/6 meeting with CD Staff	12/5/23	0.25
Alexandra Green	R20-02-008	SSA_SP	(SSA Staff Proposal Opening Comments) e-mail discussion w/ A. Salas re questions for 12/6 CD Staff Meeting	12/5/23	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Staff Proposal Opening Comments) meeting with A. Salas, CD Staff (C. Worster, H. Kumar, L. Nguyen, M. Valadez, T. Lee), and CforAT (P. Goodman) re questions on SSA Staff Proposal	12/6/23	1.00
Alexandra Green	R20-02-008	SSA_SP	(SSA Staff Proposal Opening Comments) prepare for 12/6 meeting with CD Staff	12/6/23	0.25
Alexandra Green	R20-02-008	CUSTPORT	attend LifeLine TPA/Consumer Advocates monthly meeting re official portal launch	12/13/23	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Staff Proposal Opening Comments) review and analyze wireline providers' responses to December 2023 TURN data requests	1/5/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Staff Proposal) meeting w/ A. Salas and TracFone (G. Why, H. Eysenbach) re LifeLine SSA Opening Comments	1/9/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) analyze wireline retail offerings	1/9/24	1.50
Alexandra Green	R20-02-008	SSA_SP	meeting w/ A. Salas re strategy, next steps for SSA Opening Comments	1/9/24	0.50
Alexandra Green	R20-02-008	CUSTPORT	Attend monthly consumer advocate/TPA meeting re official launch of customer portal	1/10/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) analyze data request responses re wireline retail offerings	1/10/24	1.75
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) analyze data request responses re wireline retail offerings	1/11/24	1.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) analyze data request responses re wireline LL customer data consumption	1/11/24	0.25
Alexandra Green	R20-02-008	coord	Call w/ A. Salas and CforAT (P. Goodman) re SSA proceeding and opening comments	1/12/24	1.00
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) analyze data request responses re wireless retail offerings	1/12/24	2.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) call w/ A. Salas re data analysis & next steps	1/12/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) analyze Care/Boost Pilot Mobile Data Usage	1/12/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) analyze data request responses re wireline retail offerings	1/12/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) research on wireless market offerings carriers' throttle points	1/18/24	2.75
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) Meeting w/ A. Salas, L. Fitzpatrick, and TruConnect (J. Guyan and J. Heitmann) re TruConnect's review of LifeLine market offerings	1/18/24	1.00
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) analyze wireless retail offerings	1/18/24	0.50
Alexandra Green	R20-02-008	SSA_SP	meeting w/ A. Salas re drafting assignments and internal deadlines for SSA Opening Comments	1/18/24	0.50
Alexandra Green	R20-02-008	FED	(SSA Opening Comments) research federal funding issues for section on wireline SSA recommendations	1/19/24	1.00
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) draft email to A. Salas re findings on wireless retail offerings	1/19/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) analyze wireless retail offerings	1/19/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) draft section on wireline SSA staff proposal	1/19/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) outline section on wireline SSA recommendations	1/19/24	0.25
Alexandra Green	R20-02-008	FED	(SSA Opening Comments) draft section on wireline SSA staff proposal - federal funding for voice-only service	1/20/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) research Small LEC's internet offerings	1/20/24	0.50
Alexandra Green	R20-02-008	FED	(SSA Opening Comments) revise draft section on federal funding	1/23/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Opening Comments) e-mail discussion w/ A. Salas re changes to draft SSA Opening Comments wireless sections	1/23/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) revise draft section on wireline SSA	1/23/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Opening Comments) revise draft section on wireless SSA	1/23/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(LifeLine SSA Reply Comments) review and analyze other parties' opening comments re wireless issues	1/26/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(LifeLine SSA Reply Comments) review and analyze other parties' opening comments re wireless issues	1/26/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	(SSA Reply Comments) review and analyze other parties' opening comments re wireless issues	2/6/24	1.00
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) review and analyze other parties' opening comments re wireline issues	2/6/24	1.25
Alexandra Green	R20-02-008	ACP_PILOT	(LifeLine SSA Reply Comments) outline reply comments re ACP Pilot transition	2/8/24	0.50
Alexandra Green	R20-02-008	ACP_PILOT	(LifeLine SSA Reply Comments) research on ACP Pilot	2/8/24	0.50
Alexandra Green	R20-02-008	SSA_AFFORD	(LifeLine SSA Reply Comments) outline reply comments re capping wireline co-pays	2/8/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(LifeLine SSA Reply Comments) review and analyze other parties' positions re wireline issues	2/8/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(LifeLine SSA Reply Comments) outline reply comments re wireline/broadband MSS	2/8/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(LifeLine SSA Reply Comments) outline reply comments re wireline data reporting	2/8/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(LifeLine SSA Reply Comments) outline reply comments re SSA adjustment mechanism	2/8/24	0.25
Alexandra Green	R20-02-008	SSA_SP	(SSA Reply Comments) call w/ A. Salas re strategy and division of labor	2/9/24	1.00
Alexandra Green	R20-02-008	ACP_PILOT	(SSA Reply Comments) research for recommendations on ACP Pilot	2/12/24	0.50
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA Reply Comments) research on California Public Purpose Program Surcharges	2/12/24	0.50
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA Reply Comments) draft section re standalone LifeLine broadband offering	2/12/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) revise outline for comments re wireline issues	2/12/24	0.75
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) research for recommendations re broadband speed reporting	2/12/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	draft e-mail to A. Salas re questions and research for SSA Reply Comments	2/12/24	0.25
Alexandra Green	R20-02-008	SSA_SP	(SSA Reply Comments) data analysis for LifeLine subscriber count post-URF implementation	2/12/24	1.25
Alexandra Green	R20-02-008	SSA_SP	(SSA Reply Comments) research on URF implementation	2/12/24	0.50
Alexandra Green	R20-02-008	ACP_PILOT	(SSA Reply Comments) draft sections re end of ACP & ACP Pilot	2/13/24	1.00
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA Reply Comments) draft section re broadband-only LifeLine offering	2/13/24	0.75
Alexandra Green	R20-02-008	SSA_AFFORD	(SSA Reply Comments) draft section on capping wireline co-payments	2/13/24	0.50
Alexandra Green	R20-02-008	SSA_AFFORD	(SSA Reply Comments) draft section re cap on wireline surcharges	2/13/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) draft section on broadband speed MSS	2/13/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) draft section on broadband speed reporting requirements	2/13/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) draft section on updating SSA methodology	2/13/24	0.50
Alexandra Green	R20-02-008	SSA_SP	(SSA Reply Comments) draft section re URF	2/13/24	0.25
Alexandra Green	R20-02-008	ACP_PILOT	(SSA Reply Comments) revise sections re end of ACP & ACP Pilot	2/14/24	0.75
Alexandra Green	R20-02-008	FZ_AMT	(SSA Reply Comments) revise section re updating SSA methodology	2/14/24	0.25
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA Reply Comments) revise section re broadband-only LifeLine offering	2/14/24	0.25
Alexandra Green	R20-02-008	SSA_AFFORD	(SSA Reply Comments) revise section re wireline copays	2/14/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) revise section re broadband MSS	2/14/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) revise section re broadband speed reporting	2/14/24	0.75
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA Reply Comments) research for section re broadband-only offering	2/15/24	0.50
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA Reply Comments) revise section re broadband-only offering	2/15/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(SSA Reply Comments) revise section re LifeLine program data reporting	2/15/24	0.25
Alexandra Green	R20-02-008	SSA_SP	(SSA Reply Comments) revise section revise section re impact of URF on LifeLine program	2/15/24	0.50
Alexandra Green	R20-02-008	SSA_SP	(SSA Reply Comments) revise section re Commission review of SSA and MSS	2/15/24	0.25

**R.20-02-008 (LifeLine) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA Reply Comments) e-mail conversation w/ A. Salas re broadband-only LifeLine offerings	2/16/24	0.50
Alexandra Green	R20-02-008	LLBBAND_SCHG	(SSA reply comments) research for section on broadband-only LifeLine offerings	2/16/24	0.50
Alexandra Green	R20-02-008	SSA_MSS_WLESS	prep for call w/ NaLA re LifeLine retail offerings	2/28/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLESS	meeting w/ NaLA (D. Perry, J. Gunyan, J. Heitmann), L. Fitzpatrick, and A. Salas re LifeLine SSA	2/28/24	0.25
Alexandra Green	R20-02-008	CUSTPORT	attend Monthly TPA/Consumer Advocates meeting re customer portal demo	3/13/24	0.25
Alexandra Green	R20-02-008	SSA_MSS_WLINE	(LifeLine SSA) review and analyze other parties' reply comments on Staff Proposal for SSA and MSS re wireline issues	3/25/24	0.25
Alexandra Green	R20-02-008	LLBBAND_PFM	review and analyze Cal Advocates' draft petition for modification (LifeLine for broadband-only plans)	4/18/24	0.25
Alexandra Green	R20-02-008	LLBBAND_PFM	e-mail to B. Villanueva re Cal Advocates' draft PFM (LifeLine for broadband-only plans)	4/18/24	0.25
Alexandra Green	R20-02-008	LLBBAND_SCHG	e-mail discussion w/ A. Salas re Cal Advocates' PFM (LifeLine for broadband-only plans) - cross-subsidization issue	4/19/24	0.25
Alexandra Green	R20-02-008	LLBBAND_PFM	(ACP PFM) Attend meeting re PFM w/ A. Salas, Cal Advocates (A.M. Johnson, S. Merrill), and Small LECs (P. Roswall), re: topics for PFM, drafting assignments	5/3/24	0.50
Alexandra Green	R20-02-008	AEVS	Monthly Consumer Advocates/TPA meeting re program updates, implementation of Medi-Cal enrollment checks	5/8/24	0.25
Alexandra Green	R20-02-008	coord	(FFA ACP PFM Reply) meeting w/ A. Salas and Cal Advocates (A.M. Johnson, C. Bartulo, S. Merrill) re strategy for PFM reply	5/28/24	1.25
Alexandra Green	R20-02-008	LLBBAND_MSS	(LifeLine Broadband PFM) Review and analyze final PFM, responses to PFM re proposed MSS to prep for meeting w/ Cal Advos	5/28/24	0.25
Alexandra Green	R20-02-008	LLBBAND_PFM	(LifeLine Broadband PFM) Review and analyze final PFM, responses to PFM re legal issues to prep for meeting w/ Cal Advos	5/28/24	0.25
Alexandra Green	R20-02-008	LLBBAND_SSA	(LifeLine Broadband PFM) Review and analyze final PFM, responses to PFM re proposed maximum customer copayment to prep for meeting w/ Cal Advos	5/28/24	0.25
Alexandra Green	R20-02-008	FZ_WLESS/WLINE	(SSA) review and revise draft SSA Freeze Ruling reply comments re separate SSAs for wireless and wireline service	6/14/24	0.25
Alexandra Green	R20-02-008	SSA_AFFORD	(SSA Freeze Reply comments) review AT&T COLR docket card comments re price of AT&T landline service	6/14/24	0.50
Alexandra Green	R20-02-008	SSA_AFFORD	(SSA) review and revise draft SSA Freeze Ruling reply comments re LifeLine wireline copay affordability	6/14/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) review and compare iFoster AL 2 with orders in D.24-05-003 re transition budget	7/2/24	0.25
Alexandra Green	R20-02-008	AEVS	attend Consumer Advocates/LifeLine TPA meeting re implementation of AEVS (Medi-Cal enrollment) verification	8/14/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) meet w/ CD Staff (C. Worster, M. Valadez, H. Kumar) re iFoster invoices	9/9/24	0.50
Alexandra Green	R20-02-008	FYP_TRANSITION	Attend California LifeLine TPA/Consumer Advocates monthly meeting re update on Foster Youth Pilot subscriber migration	9/11/24	0.25
Alexandra Green	R20-02-008	coord	(LifeLine Foster) draft response to Youth Law Center e-mail	9/13/24	0.50
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) attend meeting w/ A. Salas, C. Mailloux, Youth Law Center (J. Rodriguez, C. Johnson, L. Brady) re Foster Youth Pilot Transition, pilot background	10/22/24	1.00
Alexandra Green	R20-02-008	coord	(LifeLine Foster) draft follow-up email to YLC	10/23/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	attend TPA/Consumer Advocates Monthly Meeting re program statistics, Foster Youth Pilot transition	10/23/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) call w/ A. Salas re strategy for monitoring program transition, next steps	10/28/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) meet w/ CD Staff (C. Worster) re pilot program transition	10/31/24	0.25
Alexandra Green	R20-02-009	FYP_PFM	(Foster Youth) call w/ YLC (C. Johnson) re potential petition for modification	11/1/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	(Foster Youth) call w/ YLC (C. Johnson) re pilot transition	11/1/24	0.25
Alexandra Green	R20-02-008	FZ_AMT	(SSA) review SSA freeze Proposed Decision re freeze amount	11/1/24	0.25
Alexandra Green	R20-02-008	FZ_SUNST	(SSA) review SSA freeze Proposed Decision re freeze duration	11/1/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	attend California LL TPA/Consumer Advocate Monthly meeting re foster youth pilot transition, program statistics	11/13/24	0.50
Alexandra Green	R20-02-008	FYP_APP	(LifeLine Foster) attend Pilot Transition Meeting w/ CD (R. Sansone, C. Worster, H. Kumar), YLC (C. Johnson, J. Pokempner), CLC (A. Quirk), Maximus (J. Graettinger, B. Bulluck) re progress on getting replacement phones to youth	11/18/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) attend Pilot Transition Meeting w/ CD (R. Sansone, C. Worster, H. Kumar), YLC (C. Johnson, J. Pokempner), CLC (A. Quirk), Maximus (J. Graettinger, B. Bulluck) re implementation of D.25-10-025	11/18/24	0.25
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster) attend Pilot Transition Meeting w/ CD (R. Sansone, C. Worster, H. Kumar), YLC (C. Johnson, J. Pokempner), CLC (A. Quirk), Maximus (J. Graettinger, B. Bulluck) re application processing	11/19/24	0.50
Alexandra Green	R20-02-008	FZ_GO153	(SSA Freeze) review and revise draft PD opening comments re suspension of GO 153, Section 8	11/21/24	0.25
Alexandra Green	R20-02-008	SSA_AFFORD	(SSA Freeze) review and revise draft PD opening comments re LifeLine wireline copay affordability	11/21/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) research e-mail to YLC (C. Johnson) re pilot migration, prior CPUC mass migrations, and recommendations for youth outreach	11/26/24	0.50
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) draft e-mail to YLC (C. Johnson) re pilot migration, prior CPUC mass migrations, and recommendations for youth outreach	11/27/24	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	(LifeLine Foster) review prior TURN filings and staff proposal re ESAP to prepare for transition meeting re non-usage discussion	12/2/24	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	attend Foster Youth Pilot Transition meeting with CD (C. Worster, R. Sansone, H. Kumar, L. Anthony), CLC (A. Quirk), YLC (J. Pokempner, C. Johnson, K. Tanner) re non-usage, porting issues (left early)	12/3/24	0.50
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) research federal number porting and aging regulations	12/5/24	0.50
Alexandra Green	R20-02-008	FYP_TRANSITION	(LifeLine Foster) draft email to CD re porting of pilot subscribers' numbers	12/6/24	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	attend LifeLine TPA/Consumer Advocate monthly meeting re portal user self-reported demographics, Foster Youth Pilot updates	12/11/24	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	(LifeLine Foster) review iFoster pilot non-usage analysis from CD	12/16/24	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	attend Foster Youth Pilot Transition meeting with CD (C. Worster, R. Sansone, H. Kumar, L. Anthony), Maximus (R. Diollo, B. Bulluck), CLC (A. Quirk), YLC (J. Pokempner, C. Johnson, K. Tanner) re non-usage	12/17/24	0.25
Alexandra Green	R20-02-008	CUSTPORT	(LifeLine Foster) attend Foster Youth Pilot Transition Meeting w/ Maximus (B. Bulluck), YLC (C. Johnson, J. Pokempner), CLC (A. Quirk), CD (C. Worster) re plans for Maximus Phase 2 software/portal launch	1/7/25	0.25
Alexandra Green	R20-02-008	comp	draft LifeLine comp claim	1/13/25	0.75
Alexandra Green	R20-02-008	CUSTPORT	(LifeLine Foster) Attend Foster Youth Pilot Transition Meeting w/ Maximus (B. Bulluck, R. Diollo), YLC (C. Johnson, J. Pokempner), CLC (A. Quirk), CD (C. Worster, H. Kumar, R. Sansone) re plans for Maximus Phase 2 software/portal launch, issues with LA County youth enrollment	1/21/25	0.25

**R.20-02-008 (LifeLine) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Alexandra Green	R20-02-008	Comp	draft comp claim for SSA Freeze decision	1/22/25	0.75
Alexandra Green	R20-02-008	Comp	SSA freeze: outline substantial contribution section	1/24/25	1.00
Alexandra Green	R20-02-008	Comp	Draft Substantial Contribution Section of comp claim form	1/24/25	1.00
Alexandra Green	R20-02-008	Comp	SSA Freeze: draft comp claim	1/24/25	0.75
Alexandra Green	R20-02-008	Comp	SSA Freeze: code hours	1/27/25	1.50
Alexandra Green	R20-02-008	Comp	Code hours for SSA Freeze intervenor comp claim	1/27/25	1.00
Alexandra Green	R20-02-008	Comp	draft SSA Freeze comp claim	1/30/25	0.25
Alexandra Green	R20-02-008	Comp	Complete comp claim form	1/31/25	0.50
Alexandra Green	R20-02-008	FYP_APP	(LifeLine Foster) review screenshots from Maximus of updated registration and application forms	2/12/25	0.25
Alexandra Green	R20-02-008	CUSTPORT	(LifeLine Foster) attend Foster Youth Pilot Transition Meeting w/ YLC (J. Pokemnner, C. Johnson), Maximus (B. Bulluck, R. Dilollo), CD staff (C. Worster, R. Sansone), CLC (A. Quirk) re Phase 2 portal launch	2/18/25	0.25
Alexandra Green	R20-02-008	FYP_APP	(LifeLine Foster) attend Foster Youth Pilot Transition Meeting w/ YLC (J. Pokemnner, C. Johnson), Maximus (B. Bulluck, R. Dilollo), CD staff (C. Worster, R. Sansone), CLC (A. Quirk) re response to images uploaded as part of application	2/18/25	0.25
Alexandra Green	R20-02-008	FYP_APP	(LifeLine Foster) Review & issue spot YLC Petition for Modification re proposed changes to enrollment process	2/24/25	1.00
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster) Review & issue spot YLC Petition & cited materials for Modification re proposed changes to eligibility	2/24/25	0.75
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster) Review & issue spot YLC Petition for Modification re proposed changes to eligibility documents	2/24/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster) review YLC Petition for Modification re proposed changes to eligibility	2/25/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster, YLC PFM) review current and new pilot enrollment counts	2/26/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster, YLC PFM) research re iFoster pilot budget and enrollment forecast	2/27/25	0.50
Alexandra Green	R20-02-008	FYP_PFM	(LifeLine Foster) outline response to Youth Law Center PFM	2/27/25	0.50
Alexandra Green	R20-02-008	FYP_APP	prep for meeting w/ YLC re petition for modification re proposed application process changes	3/4/25	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	prep for meeting w/ YLC re petition for modification re non-usage issue	3/4/25	0.25
Alexandra Green	R20-02-008	CUSTPORT	attend Foster Youth Pilot Transition meeting w/ YLC (J. Pokemnner, C. Johnson), Maximus (B. Bulluck, J. Gaetttinger, R. Dilollo), CLC (A. Quirk), CPUC (L. Anthony, H. Kumar, C. Worster, R. Sansone) re: Phase 2 portal launch	3/4/25	0.25
Alexandra Green	R20-02-008	FYP_APP	call w/ YLC (C. Johnson, J. Rodriguez) re proposed changes to Foster Youth Pilot enrollment process	3/5/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	call w/ YLC (C. Johnson, J. Rodriguez) re proposed changes to Foster Youth Pilot eligibility	3/5/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster) research re youth who re-enter care for response to YLC PFM	3/6/25	0.25
Alexandra Green	R20-02-008	FYP_PFM	(LifeLine Foster) outline response to YLC PFM	3/6/25	0.50
Alexandra Green	R20-02-008	CUSTPORT	attend Foster Youth Pilot Transition meeting w/ YLC (J. Pokemnner, C. Johnson), Maximus (B. Bulluck, J. Gaetttinger, R. Dilollo), CLC (A. Quirk), CPUC (L. Anthony, H. Kumar, C. Worster, R. Sansone), re: change to portal and application process	3/18/25	0.50
Alexandra Green	R20-02-008	FYP_ELIG	draft response to YLC PFM re eligibility	3/18/25	1.25
Alexandra Green	R20-02-008	FYP_ELIG	research re foster care re-entry for response to YLC PFM re eligibility	3/18/25	0.50
Alexandra Green	R20-02-008	FYP_ELIG	draft response to YLC PFM re proposed changes in eligibility	3/19/25	0.50
Alexandra Green	R20-02-008	FYP_NON-USAGE	draft response to YLC PFM re non-usage	3/19/25	1.25
Alexandra Green	R20-02-008	FYP_ELIG	revise response to YLC PFM re eligibility	3/20/25	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	draft response to YLC PFM re non-usage	3/20/25	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	revise response to YLC PFM re non-usage	3/20/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	review T. Long's feedback on draft PFM response re eligibility	3/21/25	0.25
Alexandra Green	R20-02-008	FYP_NON-USAGE	review T. Long's feedback on draft PFM response re non-usage	3/21/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	revise YLC PFM response re eligibility	3/24/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	(LifeLine Foster) revise reply to YLC PFM re eligibility	3/26/25	0.25
Alexandra Green	R20-02-008	LLBBAND_MSS	research for Staff Proposal Opening Comments (need for both voice and broadband subsidies)	5/12/2025	1
Alexandra Green	R20-02-008	LLBBAND_MSS	draft Staff Proposal Opening Comments re need for both voice and broadband subsidies	5/12/2025	0.75
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Report Opening Comments) research re: ability of Commission to mandate provider participation	5/13/2025	1.5
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Report Opening Comments) draft provider participation section	5/13/2025	1.5
Alexandra Green	R20-02-008	LLBBAND_DUR	(Staff Report Opening Comments) revise program parameters section	5/14/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Report Opening Comments) draft section re program parameters	5/14/2025	0.75
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Report Opening Comments) research re: ability of Commission to mandate provider participation	5/14/2025	1.5
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Report Opening Comments) e-mail disc w/ A. Salas re Commission ability to mandate provider participation	5/14/2025	0.75
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Report Opening Comments) call w/ A. Salas re Commission ability to mandate provider participation	5/14/2025	0.5
Alexandra Green	R20-02-008	LLBBAND_ELIG	(Staff Report opening comments) review and revise A. Salas draft sections re subscriber eligibility	5/16/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_MSS	(Staff Report opening comments) review and revise A. Salas draft sections re broadband MSS	5/16/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_SP	call w/ A. Salas re draft Staff Proposal Opening Comments	5/16/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Report reply comments) review other parties' opening comments re legis issues	5/18/2025	0.5
Alexandra Green	R20-02-008	LLBBAND_MSS	pilot MSS	5/19/2025	0.75
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Report reply comments) review and issue spot other parties' opening comments re need for pilot/barriers to broadband adoption	5/19/2025	0.75
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Report reply comments) review and issue spot other parties' opening comments re provider participation	5/19/2025	0.5
Alexandra Green	R20-02-008	LLBBAND_SSA	(Staff Report reply comments) review and issue spot other parties' opening comments re subsidy amount	5/19/2025	0.5
Alexandra Green	R20-02-008	LLBBAND_DUR	(Broadband Affordability Staff Report replies) outline reply comments re pilot parameters	5/22/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_ELIG	(Broadband Affordability Staff Report replies) outline reply comments re eligibility	5/22/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Affordability Staff Report replies) outline reply comments re pilot MSS	5/22/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Broadband Affordability Staff Report replies) outline reply comments re provider arguments in support of pilot	5/22/2025	1
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Broadband Affordability Staff Report replies) outline reply comments re other barriers to broadband adoption	5/22/2025	0.75
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Proposal Replies) draft section re need for pilot	5/25/2025	1
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Proposal Replies) call w/ A. Salas re division of drafting, strategy re need for pilot	5/25/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Proposal Replies) call w/ A. Salas re division of drafting, strategy re legislative issues	5/25/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Proposal Replies) draft section re low-cost plan mandate	5/25/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_SP	(Staff Proposal Replies) draft section re pilot streamlining	5/25/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_DUR	(Staff Proposal Replies) draft section re pilot program requirements/parameters	5/26/2025	0.5

**R.20-02-008 (LifeLine) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Alexandra Green	R20-02-008	LLBBAND_ELIG	(Staff Proposal Replies) draft section re eligibility	5/26/2025	0.5
Alexandra Green	R20-02-008	LLBBAND_SP	(Staff Proposal Replies) draft section re pilot streamlining	5/26/2025	0.5
Alexandra Green	R20-02-008	LLBBAND_DUR	(Staff Proposal replies) revise section re pilot parameters	5/27/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_ELIG	(Staff Proposal replies) revise section re eligibility	5/27/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Proposal Replies) research re federal preemption	5/27/2025	0.5
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Proposal replies) revise section re need for pilot	5/27/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Staff Proposal Replies) research re need for pilot section	5/27/2025	0.25
Alexandra Green	R20-02-008		(Staff Proposal replies) e-mail disc w/ A. Salas re federal preemption/CPUC jurisdiction arguments	5/27/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_SSA	(Staff proposal replies) research re rate regulation/price caps	5/27/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_PROVIDER	(Staff Report Replies) revise AS's draft sections re provider participation	5/28/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_SCHG	(Staff Report Replies) revise AS's draft sections re funding issues	5/28/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_SP	call w/ A. Salas re revisions to Staff Report Reply comments	5/28/2025	0.25
Alexandra Green	R20-02-008	LLBBAND_SSA	(Staff Report Replies) revise AS's draft sections re subsidy amount issues	5/28/2025	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	attend LifeLine TPA/Consumer Advocates monthly meeting re Foster Youth Pilot statistics	6/11/25	0.25
Alexandra Green	R20-02-008	FYP_PFMSP	(Staff proposal opening comments) review staff proposal	6/16/25	0.25
Alexandra Green	R20-02-008	FYP_APP	(Staff Proposal Opening comments) draft section re authorize applicants applying on behalf of minor foster youth	6/17/25	0.50
Alexandra Green	R20-02-008	FYP_ELIG	(Staff Proposal Opening comments) draft section re option for non-minor foster youth to enroll in California LifeLine	6/17/25	0.25
Alexandra Green	R20-02-008	FYP_NON_USAGE	(Staff Proposal Opening comments) draft section re non-usage rule	6/17/25	0.25
Alexandra Green	R20-02-008	FYP_PFMSP	(Staff Proposal Opening Comments) review Staff proposal and YLC PFM	6/17/25	0.25
Alexandra Green	R20-02-008	FYP_PFMSP	(Staff Proposal Opening Comments) outline opening comments	6/17/25	0.25
Alexandra Green	R20-02-008	FYP_ELIG	(Staff Proposal Opening Comments) draft section re database matching agreement w/ CDSS	6/18/25	0.25
Alexandra Green	R20-02-008	FYP_NON_USAGE	(Staff proposal Opening comments) draft section re non-usage	6/18/25	0.50
Alexandra Green	R20-02-008	coord	(staff proposal opening comments) Call w/ YLC (C. Johnson) re coordination on opening comments	6/23/25	0.50
Alexandra Green	R20-02-008	FYP_APP	Attend Foster Youth Pilot Transition Meeting with YLC (A. Quirk), YLC (J. Pokempner, C. Johnson), Maximus (R. Dilollo, B. Bullock, J. Graettinger), CD Staff (H. Kumar, R. Sansone, N. Clark, L. Anthony) re outstanding applications with counties, reconciling list of devices sent to LA county	6/24/25	0.25
Alexandra Green	R20-02-008	FYP_PFMSP	(Foster Youth Staff Proposal Replies) review and issue spot other parties' opening comments	6/30/25	0.50
Alexandra Green	R20-02-008	FYP_ELIG	(Foster Youth, Staff proposal replies) research re one per household rule	7/1/25	0.50
Alexandra Green	R20-02-008	FYP_ELIG	(Foster Youth, Staff proposal replies) draft section re one per household rule	7/1/25	0.50
Alexandra Green	R20-02-008	FYP_NON_USAGE	(Foster Youth, Staff proposal replies) draft section re non-usage	7/1/25	0.25
Alexandra Green	R20-02-008	FYP_PFMSP	(Foster Youth, Staff proposal replies) outline reply comments	7/1/25	0.25
Alexandra Green	R20-02-008	LLBBAND_SP	review other parties' reply comments on broadband affordability staff proposal	7/1/25	0.50
Alexandra Green	R20-02-008	FYP_ELIG	(Foster Youth, Staff proposal replies) revise section re one per household rule	7/2/25	0.50
Alexandra Green	R20-02-008	FYP_APP	(Staff Proposal Reply Comments) draft section re administrative burden on counties	7/7/25	0.50
Alexandra Green	R20-02-008	FYP_ELIG	(Foster Youth Staff Proposal Reply Comments) revise draft comments re one per household rule	7/10/25	0.25
Alexandra Green	R20-02-008	FYP_NON_USAGE	(Foster Youth Staff Proposal Reply Comments) revise draft comments re non-usage	7/10/25	0.25
Alexandra Green	R20-02-008	FYP_NON_USAGE	(Foster Youth) revise Staff Proposal Reply Comments re proposed non-usage rule	7/11/25	0.25
Alexandra Green	R20-02-008	FYP_APP	attend Foster Youth Pilot Transition meeting with Maximus (B. Bullock, J. Graettinger), YLC (J. Pokempner), CLC (A. Quirk), CD (H. Kumar, L. Anthony, N. Clark, S. Yun, R. Sansone) re county application approval process	7/22/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PD	(Broadband Pilot PD opening comments) review PD	7/25/25	0.25
Alexandra Green	R20-02-008	LLBBAND_DATA	review broadband subsidy pilot PD re data collection	7/31/25	0.25
Alexandra Green	R20-02-008	LLBBAND_DUR	review broadband subsidy pilot PD re pilot parameters/duration	7/31/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PD	call w/ A. Salas re strategy, drafting assignments for broadband pilot PD opening comments	7/31/25	0.25
Alexandra Green	R20-02-008	FED	(Broadband Pilot PD opening comments) draft section re subsidy make-up for CA-only subscribers	8/5/25	0.25
Alexandra Green	R20-02-008	LLBBAND_MSS	draft Broadband Pilot PD opening comments re MSS for bundled voice	8/5/25	0.75
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Pilot PD opening comments) research for section re MSS for bundled voice	8/5/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PD	outline Broadband Pilot PD opening comments	8/5/25	0.25
Alexandra Green	R20-02-008	LLBBAND_ELIG	(Broadband Pilot PD opening comments) draft section re household worksheet	8/6/25	0.25
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Pilot PD opening comments) draft section re MSS for bundled voice	8/6/25	0.50
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Pilot PD opening comments) research ACP Pilot offerings re MSS and actual offerings	8/7/25	0.25
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Pilot PD opening comments) draft section re MSS for bundled voice	8/7/25	0.25
Alexandra Green	R20-02-008	coord	email disc w/ A. Salas re coordinating w/ CET on Pilot PD opening comments	8/11/25	0.25
Alexandra Green	R20-02-008	FYP_TRANSITION	attend monthly TPA/Consumer Advocate meeting re updates on Foster Youth Pilot	8/13/25	0.25
Alexandra Green	R20-02-008	TRIBAL	(Broadband Pilot PD opening comments) revise Tribal ETC makeup section	8/14/25	0.50
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Pilot PD reply comments) review and issue spot other parties' reply comments re technology neutrality & proposed MSS	8/15/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Broadband Pilot PD reply comments) review and issue spot other parties' reply comments re need for pilot	8/15/25	0.50
Alexandra Green	R20-02-008	LLBBAND_SCHG	(Broadband Pilot PD reply comments) review and issue spot other parties' reply comments re funding issues	8/15/25	0.50
Alexandra Green	R20-02-008	LLBBAND_SSA	(Broadband Pilot PD reply comments) review and issue spot other parties' reply comments re equipment costs	8/15/25	0.25
Alexandra Green	R20-02-008	TRIBAL	(Broadband Pilot PD reply comments) call w/ A. Salas, C. Worster, L. Nguyen, S. Selvalakshmirajeswara re federal make-up	8/15/25	0.75
Alexandra Green	R20-02-008	LLBBAND_DATA	(Broadband Pilot PD reply comments) draft section re reporting requirements	8/18/25	0.50
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Pilot PD reply comments) draft section re technology neutrality	8/18/25	0.50
Alexandra Green	R20-02-008	LLBBAND_MSS	(Broadband Pilot PD reply comments) draft section re 911 access warning to standalone broadband subscribers	8/18/25	0.50
Alexandra Green	R20-02-008	LLBBAND_PD	(Broadband Pilot PD reply comments) meeting w/ A. Salas re strategy, topics for reply comments	8/18/25	0.50
Alexandra Green	R20-02-008	LLBBAND_PD	outline Broadband Pilot PD reply comments	8/18/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Broadband Pilot PD reply comments) draft section re pending legislation	8/18/25	0.50
Alexandra Green	R20-02-008	LLBBAND_PILOT	(Broadband Pilot PD reply comments) draft section re subscription vulnerability/adoption	8/18/25	0.25
Alexandra Green	R20-02-008	LLBBAND_SCHG	(Broadband Pilot PD reply comments) draft section re pilot cost	8/18/25	0.25
Alexandra Green	R20-02-008	LLBBAND_SSA	(Broadband Pilot PD reply comments) draft section re equipment costs	8/18/25	0.25
Alexandra Green	R20-02-008	TRIBAL	(Broadband Pilot PD reply comments) draft section re Small LECs' proposed minimum speed exemption - benefits to Tribal providers	8/18/25	0.50
Alexandra Green	R20-02-008	LLBBAND_MSS	revise Broadband Pilot PD reply comments re MSS & tech neutrality	8/19/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PILOT	revise Broadband Pilot PD reply comments re pending legislation	8/19/25	0.25

**R.20-02-008 (LifeLine) TURN Compensation Claim**

**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Alexandra Green	R20-02-008	LLBBAND_SCHG	revise Broadband Pilot PD reply comments re funding issues	8/19/25	0.25
Alexandra Green	R20-02-008	coord	email disc. w/ CforAT (M.W. Kasnitz) and Cal Advocates (S. Merrill, T. Floyd) re Broadband pilot PD, Rev. 1	8/26/25	0.25
Alexandra Green	R20-02-008	coord	call w/ M. Kasnitz, A. Salas re response to Broadband Pilot PD, Rev. 1	8/26/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PD	review LifeLine Broadband PD Rev. 1	8/26/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PD	email disc. w/ B. Finkelstein re Broadband pilot PD, Rev. 1	8/26/25	0.25
Alexandra Green	R20-02-008	LLBBAND_PD	draft email to Pres. Reynolds' office re Broadband pilot PD, Rev. 1	8/26/25	0.25
Alexandra Green	R20-02-008	GO153_VOIP	outline GO 153 PD opening comments re VoIP operating authority	10/30/2025	0.25
Alexandra Green	R20-02-008	GO153_SUP	research for GO 153 PD opening comments re surcharges	10/31/2025	0.25
Alexandra Green	R20-02-008	GO153_APP	research for GO 153 PD opening comments re options for initiating for LifeLine applications	10/31/2025	0.25
Alexandra Green	R20-02-008	GO153_SSN	outline GO 153 PD opening comments re SSN issue	10/31/2025	0.25
Alexandra Green	R20-02-008	GO153_LINKS	draft GO 153 PD opening comments re non-functioning links	10/31/2025	0.25
Alexandra Green	R20-02-008	GO153_VOIP	draft GO 153 PD opening comments re VoIP operating authority	10/31/2025	0.5
Alexandra Green	R20-02-008	GO153_APP	draft GO 153 PD opening comments re proposed modifications to definition of "application date"	10/31/2025	0.5
Alexandra Green	R20-02-008	GO153_SSN	draft LL GO 153-A PD opening comments re SSN requirement	11/3/25	0.50
Alexandra Green	R20-02-008	GO153_SSN	revise to GO 153 PD opening comments re SSN edits	11/4/25	0.25
Alexandra Green	R20-02-008	coord	review and provide feedback on CforAT's GO 153-A PD Opening comments	11/4/25	0.25
Alexandra Green	R20-02-008	GO153_VOIP	review other parties' GO 153 PD opening comments re VoIP issues	11/4/25	0.50
Alexandra Green	R20-02-008	coord	call w/ M. Kasnitz re topics for GO 153 PD reply comments	11/5/25	0.25
Alexandra Green	R20-02-008	GO153_VOIP	draft PD reply comments in response to Charter comments re treatment of VoIP LifeLine providers	11/6/25	1.00
Alexandra Green	R20-02-008	GO153_VOIP	draft PD reply comments in response to Charter comments re revisions to basic service elements	11/6/25	0.50
Alexandra Green	R20-02-008	GO153_SUP	draft GO 153 PD comments re AT&T's arguments (changes superseding D.22-10-021)	11/6/25	0.50
Alexandra Green	R20-02-008	GO153_PD	draft GO 153 PD comments re AT&T's arguments (carrier -> service provider)	11/10/25	0.50
Alexandra Green	R20-02-008	GO153_VOIP	revise GO 153 PD opening comments re obligations of wireline/VoIP providers	11/10/25	0.25
Alexandra Green	R20-02-008	GO153_PD	revise GO 153 PD opening comments re AT&T's arguments (citations process)	11/10/25	0.25
Alexandra Green	R20-02-008	GO153_PD	review GO 153-A PD rev. 1	11/18/25	0.25
Alexandra Green	R20-02-008	Comp	review of unclaimed hours for January comp claim	11/18/25	1.00
Alexandra Green	R20-02-008	Comp	begin drafting comp claim	11/19/25	0.75
Alexandra Green	R20-02-008	Comp	research re TURN work on 2022 Program Assessment comments	11/19/25	0.50
Alexandra Green	R20-02-008	Comp	code hours for comp claim	11/19/25	1.75
Alexandra Green	R20-02-008	Comp	outline substantive areas of new decisions for comp claim	11/20/25	0.75
Alexandra Green	R20-02-008	Comp	code hours for comp claim	11/20/25	0.50
Alexandra Green	R20-02-008	comp	code hours for January comp claim	12/22/2025	3
Alexandra Green	R20-02-008	comp	code hours for LifeLine comp claim	12/26/2025	0.5
Alexandra Green	R20-02-008	comp	draft Lifeline comp claim	12/29/2025	1.75
Alexandra Green	R20-02-008	comp	draft Lifeline comp claim	12/30/25	2.00
Alexandra Green	R20-02-008	comp	code hours for LifeLine comp claim	12/30/25	0.50
Alexandra Green	R20-02-008	comp	draft Lifeline comp claim	12/31/2025	3.75
Alexandra Green	R20-02-008	comp	draft Lifeline comp claim	1/12/26	1.25
Alexandra Green	R20-02-008	comp	draft Lifeline comp claim	1/15/26	1.00
Alexandra Green	R20-02-008	comp	draft Lifeline comp claim	1/16/26	0.75
Alexandra Green	R20-02-008	comp	revise coded hours for claim	1/20/26	2.00
				<b>Alexandra Green Total</b>	<b>151.25</b>
Ashley Salas	R20-02-008	PRGASSESS	Program Assessment - Read and issue spot opening comments	6/23/22	1.75
Ashley Salas	R20-02-009	SSA_AFFORD	Program Assessment - draft reply comment outline re affordability of co-payments	6/23/22	0.50
Ashley Salas	R20-02-008	SSA_AFFORD	Program Assessment - draft reply comments re affordability of co-payments	6/29/22	3.50
Ashley Salas	R20-02-008	coord	Program Assessment - review CforAT draft comments	6/30/22	0.25
Ashley Salas	R20-02-008	coord	Program Assessment - email disc w/ CforAT (PG), BV, GLI (VL) RE CforAT draft comments	6/30/22	0.25
Ashley Salas	R20-02-008	coord	Program Assessment - email disc w/ GLI (VL) RE GLI signing on to TURN's draft reply comments	6/30/22	0.25
Ashley Salas	R20-02-008	MSS	Program Assessment - draft reply comments re recommending against modeling LifeLine after ACP	6/30/22	5.50
Ashley Salas	R20-02-008	FED	Federal Lifeline - review FCC order RE phase out of support for voice services	7/1/22	0.50
Ashley Salas	R20-02-009	MSS	Program Assessment - edit and revise draft reply comments re recommending against modeling LifeLine after ACP	7/1/22	1.50
Ashley Salas	R20-02-008	SSA_AFFORD	Program Assessment - edit and revise draft reply comments re affordability of co-payments	7/1/22	1.25
Ashley Salas	R20-02-008	PRGASSESS	Program Assessment - call w/ BV RE next steps	7/26/22	0.25
Ashley Salas	R20-02-008	FED	Email disc w/ LF RE FCC 2016 Lifeline Order	6/8/23	0.25
Ashley Salas	R20-02-008	CUSTPORT	TPA/ Consumer Working Group call re official launch of portal phase 1, portal registration process	11/8/23	0.50
Ashley Salas	R20-02-008	SSA_SP	TracFone Motion for Extension of Time - email disc w/ TF (GW, HE), VZ (JR) re Rule 11.6, not oppose extension request	11/21/23	0.25
Ashley Salas	R20-02-008	SSA_SP	TracFone Motion for Extension of Time - call w/ TF (GW) re Rule 11.6, TURN's position	11/21/23	0.25
Ashley Salas	R20-02-008	SSA_SP	SSA Staff Proposal - call w/ CforAT (PG) re: TF/ VZ's extension request	11/21/23	0.25
Ashley Salas	R20-02-008	SSA_SP	SSA Staff Proposal - call w/ CD (CW) re: TF/VZ's request for extension of time	11/21/23	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA Staff Proposal - email CD re scheduling clarifying call	11/27/23	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - draft outline of opening comments re wireless issues	12/5/23	0.25
Ashley Salas	R20-02-008	SSA_SP	SSA - prep for call w/ CD (1/6)	12/5/23	0.75
Ashley Salas	R20-02-008	SSA_SP	SSA - issue spot staff proposal re wireless issues	12/5/23	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - draft discovery requests to T-Mobile	12/6/23	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLINE	SSA - draft discovery requests to Small LECs	12/6/23	0.50
Ashley Salas	R20-02-008	SSA_SP	SSA - call w/ AG, CforAT (PG), CD (CW, TL, LN, MV, HK) re: SSA staff proposal	12/6/23	0.75
Ashley Salas	R20-02-008	SSA_SP	SSA - email disc w/ AG, LF re discovery requests	12/7/23	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLINE	TURN DR 1 to Small LECs - review Small LECs' response	12/8/23	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLINE	TURN DR 2 to TruConnect - email disc w/ TruConnect (JG, DP, JH), AG, LF, RY re: TruConnect's objections	12/12/23	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - email disc w/ TruConnect (JG, DP, JH), AG, LF, RY re: TruConnect's objections, partial response	12/15/23	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to AT&T - email disc w/ AT&T (CV, AU) re AT&T's failure to meet the DR deadline	12/21/23	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - schedule meet and confer with TruConnect	1/2/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - email disc w/ TruConnect (JG, JH, DP), AG, LF, RY re rescheduling	1/4/24	0.25

**R.20-02-008 (LifeLine) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to T-Mobile - email disc w/ LF, AG, T-Mobile (HM, SK, TT) re T-Mobile's second extension request	1/5/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to T-Mobile - email disc w/ LF, AG, T-Mobile (HM, SK, TT) re scheduling meet and confer	1/5/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - call w/ TruConnect, (JG, DP, JH) re meet and confer	1/8/24	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TracFone - email disc w/ TracFone (GW, HE, RK) re scheduling call	1/8/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TracFone - call w/ TracFone re TracFone's responses	1/9/24	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - review wireless providers' responses to TURN DRs	1/9/24	0.50
Ashley Salas	R20-02-008	coord	SSA - call w/ AG, CforAT (PG) re strategy, next steps on opening comments	1/12/24	1.00
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - call w/ AG re analysis of mobile data usage	1/12/24	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to T-Mobile - email disc w/ LF, AG, T-Mobile (HM, SK, TT) re timing of T-Mobile's response	1/12/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - call w/ AG, LF, TruConnect, (JG, DP, JH) re meet and confer	1/12/24	0.25
Ashley Salas	R20-02-008	ACP_PILOT	SSA - reply - edit ACP section	1/13/24	
Ashley Salas	R20-02-008	FED	SSA - reply - draft section re makeup for non-ETCs	1/13/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - reply - edit wireless sections	1/13/24	1.00
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to T-Mobile - disc w/ T-Mobile re timing of its response	1/16/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - disc w/ TruConnect re timing of its response	1/16/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to T-Mobile - email disc w/ LF, AG, T-Mobile (HM, SK, TT) re meet and confer	1/16/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - call w/ AG, LF, TruConnect, (JG, DP, JH) re meet and confer	1/16/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - call w/ TruConnect re mass market offerings	1/18/24	1.00
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - call w/ AG re strategy and next steps on wireless market offerings	1/18/24	0.75
Ashley Salas	R20-02-008	SSA_MSS_WLESS	TURN DR 2 to TruConnect - call w/ AG, LF, TruConnect, (JG, DP, JH) re meet and confer	1/18/24	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - prep for call w/ TruConnect	1/18/24	0.25
Ashley Salas	R20-02-008	SSA_SP	SSA - opening - draft outline re program-wide suggestions	1/18/24	0.50
Ashley Salas	R20-02-008	SSA_SP	SSA - opening - draft threshold issues	1/19/24	5.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - opening - draft comments re wireless services	1/20/24	5.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - opening - draft, edit, and revise comments re wireless services	1/21/24	6.75
Ashley Salas	R20-02-008	FED	SSA - opening - edit and revise draft comments re wireless section (federal LifeLine funding)	1/22/24	2.50
Ashley Salas	R20-02-008	SSA_MSS_WLINE	SSA - opening - edit and revise draft comments re wireline section	1/22/24	2.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - opening - edit and revise wireless section	1/23/24	5.75
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - opening - edit and revise wireless section	1/24/24	4.75
Ashley Salas	R20-02-008	SSA_SP	SSA - opening - correct issue that caused rejection by docket office	1/25/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - issue spot opening comments re wireless issues	2/8/24	1.00
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - request from CPUC the wireless provider's ALs 2014-present	2/8/24	0.25
Ashley Salas	R20-02-008	SSA_SP	SSA - reply - disc w/ AG re next steps	2/8/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - issue spot opening comments re wireless issues	2/9/24	2.00
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - disc w/ CD re request for providers' advice letters	2/9/24	0.25
Ashley Salas	R20-02-008	SSA_SP	SSA - disc w/ AG re division of drafting	2/9/24	0.25
Ashley Salas	R20-02-008	ACP_PILOT	SSA - respond to AG's email re implications of ACP going away for LL/ACP Pilot	2/13/24	0.25
Ashley Salas	R20-02-008	FZ_AMT	SSA - reply - draft wireless section re freezing SSA	2/13/24	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - reply - draft wireless sections	2/13/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	Email disc w/ AG re wireless ALs	2/13/24	0.25
Ashley Salas	R20-02-008	CUSTPORT	attend LifeLine TPA/Consumer Advocates Monthly Meeting re customer portal statistics	2/14/24	0.25
Ashley Salas	R20-02-009	FED	SSA - reply - draft Red Pocket/non- ETC section	2/14/24	1.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - reply - draft wireless section	2/14/24	3.50
Ashley Salas	R20-02-008	SSA_MSS_WLINE	SSA - reply - review AG's draft re wireline	2/14/24	1.75
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - reply - draft, edit, and revise wireless section	2/15/24	8.75
Ashley Salas	R20-02-008	FED	SSA - email disc w/ TPA re Red Pocket subscriber count	2/16/24	0.25
Ashley Salas	R20-02-008	LLBBAND_SCHG	SSA - email disc w/ AG re standalone broadband support	2/16/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLINE	SSA - reply - edit wireline section	2/16/24	4.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - prep for call w/ NaLA re staff proposal, retail offerings	2/27/24	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - call w/ LF, NaLA (Josh G, Danielle, John Heitmann) re TURN data request	2/28/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA - call w/ LF, AG, NaLA (Josh G, Danielle, John Heitmann) re retail rates	2/28/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	NDA - disc w/ TruConnect (DP) re TURN DR 2	3/13/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	Discovery - TURN DR 2 to TruConnect - email disc w/ LF, TruConnect (DP, JG, JH) re NDA	3/15/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	Discovery - draft TruConnect NDA	3/20/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	Discovery - draft TruConnect NDA	3/20/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	Discovery - disc w/ LF, AG, TruConnect (DP, JG, JH) re draft NDA	3/20/24	0.25
Ashley Salas	R20-02-008	SSA_MSS_WLESS	Discovery - TURN DR 2 to TruConnect - email disc w/ LF, AG, TruConnect (DP, JG, JH) re NDA	3/21/24	0.25
Ashley Salas	R20-02-008	coord	ACP PFM - email disc w/ PAO (AMJ, SM, CB, TF), CforAT (PG), AG, BV, RC re PAO's draft - next steps	4/18/24	0.25
Ashley Salas	R20-02-008	LLBBAND_DATA	ACP PFM - edit and revise re temporary support, contingency if ACP receives funding, data gathering same as LL-ACP Pilot, access to 911 and other emergency services	4/18/24	2.75
Ashley Salas	R20-02-008	LLBBAND_DATA	ACP PFM - email disc w/ BV, AG, RC, LF re data collection, 911 and other emergency services	4/18/24	0.25
Ashley Salas	R20-02-008	LLBBAND_DUR	ACP PFM - call w/ PAO (AMJ) re interim period	4/18/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - call w/ BV re PAO's draft PFM re standalone broadband - next steps	4/18/24	0.25
Ashley Salas	R20-02-008	LLBBAND_DATA	ACP PFM - edit and revise PAO's draft re data collection	4/19/24	0.50
Ashley Salas	R20-02-008	LLBBAND_DUR	ACP PFM - email disc w/ PAO (AMJ, SM, CB, TF), CforAT (PG), AG, BV, RC re PAO's draft - strategy re temporary time period, next steps	4/19/24	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	ACP PFM - edit and revise PAO's draft re broadband MSS	4/19/24	0.50
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - edit and revise PAO's draft re redlines to D.20-10-006	4/19/24	1.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - edit and revise PAO's draft re ACP background	4/19/24	0.50
Ashley Salas	R20-02-008	LLBBAND_SSA	ACP PFM - edit and revise PAO's draft re pricing	4/19/24	0.75
Ashley Salas	R20-02-008	LLBBAND_DUR	ACP PFM - review PAO's revised draft re duration of support for standalone broadband	4/22/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - review PAO's revised draft re redlines to D.20-10-006	4/22/24	0.50
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - email disc w/ PAO (AMJ, SM, CB, TF), AG re need for motion to shorten time	4/22/24	0.25
Ashley Salas	R20-02-008	LLBBAND_DUR	ACP PFM - email disc w/ PAO (AMJ, SM, CB, TF), AG re strategy re duration of support	4/23/24	0.25
Ashley Salas	R20-02-008	LLBBAND_ELIG	ACP PFM - email disc w/ PAO (AMJ, SM) re number of ACP subscribers enrolled in standalone broadband	4/26/24	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	SSA PFM - call w/ AG, Small LECs (RP), PAO (AMJ, SM) re lessons learned from LL-ACP Pilot on program offerings	5/3/24	0.50
Ashley Salas	R20-02-008	LLBBAND_PFM	SSA PFM - call w/ AG, Small LECs (RP), PAO (AMJ, SM) re lessons learned from LL-ACP Pilot on provider participation	5/3/24	0.25
Ashley Salas	R20-02-008	LLBBAND_ELIG	Broadband Pilot - draft opening comments re subscriber eligibility	5/12/24	0.25
Ashley Salas	R20-02-008	coord	SSA PFM - email disc w/ PAO (SM, AMJ), AG re request for opportunity to file reply comments	5/23/24	0.25

**R.20-02-008 (LifeLine) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Ashley Salas	R20-02-008	coord	SSA PFM - call w/ AG, PAO (AMJ, CB, SM) re reply - strategy, division of drafting, next steps	5/28/24	1.25
Ashley Salas	R20-02-008	LLBBAND_DUR	SSA PFM - issue spot other parties' responses re PFM duration	5/28/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	SSA PFM - issue spot other parties' responses re legal authority	5/28/24	0.25
Ashley Salas	R20-02-008	coord	SSA PFM - call w/ PAO (AMJ) re coordinating strategy	5/30/24	0.25
Ashley Salas	R20-02-008	LLBBAND_DUR	SSA PFM - draft TURN reply comments re limited duration of PFM proposal	5/30/24	1.50
Ashley Salas	R20-02-008	LLBBAND_MSS	SSA PFM - edit and revise PAO's draft re clarification on supported plan offerings	5/30/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	SSA PFM - reply - review PAO's draft re supported offerings	5/30/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	SSA PFM - draft TURN reply comments re other parties' proposals to expand PFM	5/30/24	0.75
Ashley Salas	R20-02-008	LLBBAND_PFM	SSA PFM - reply - review PAO's draft re legal issue	5/30/24	0.25
Ashley Salas	R20-02-008	LLBBAND_SSA	SSA PFM - reply - review PAO's draft re proposed maximum co-payment	5/30/24	0.25
Ashley Salas	R20-02-008	coord	SSA PFM - email disc w/ PAO (SM) re coordinating efforts	5/31/24	0.25
Ashley Salas	R20-02-008	LLBBAND_DUR	SSA PFM - draft TURN reply comments re limited duration of PFM proposal	6/1/24	2.00
Ashley Salas	R20-02-008	LLBBAND_PFM	SSA PFM - draft TURN reply comments re other parties' proposals to expand PFM	6/2/24	2.50
Ashley Salas	R20-02-008	coord	SSA PFM - reply - email disc w/ PAO (SM) re coordinating	6/3/24	0.25
Ashley Salas	R20-02-008	LLBBAND_DUR	SSA PFM - edit and revise reply comments re limited duration of PFM proposal	6/3/24	1.25
Ashley Salas	R20-02-008	LLBBAND_MSS	SSA PFM - reply - discs w/ PAO (AMJ) re emergency services	6/3/24	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	SSA PFM - call w/ PAO (AMJ) re 911 emergency services	6/3/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	SSA PFM - edit and revise reply comments re other parties' proposals to expand PFM	6/3/24	0.50
Ashley Salas	R20-02-008	SSA_MSS_WLESS	SSA Ruling - issue spot opening comments re other parties' proposals for wireless SSAs	6/3/24	0.25
Ashley Salas	R20-02-009	SSA_MSS_WLINE	SSA Ruling - issue spot opening comments re other parties' proposals for wireless SSAs	6/3/24	0.25
Ashley Salas	R20-02-008	AEVS	TPA/ Consumer Working Group Call re updates to Medi-Cal checks	6/12/24	0.25
Ashley Salas	R20-02-008	CUSTPORT	TPA/ Consumer Working Group Call re updates to subscriber portal	6/12/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - draft talking points for ex parte meeting	6/12/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - call w/ AG, LF re ACP-related PFM ex parte prep	6/12/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - ex parte w/ Crm. Houck's Advisor (BW), AG, LF re LifeLine ACP PFM	6/12/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - ex parte w/ Pres. Reynolds' Advisor (MM) re LifeLine PFM	6/13/24	0.25
Ashley Salas	R20-02-008	LLBBAND_PFM	ACP PFM - call w/ LF, AG re next steps post-ex partes	6/13/24	0.25
Ashley Salas	R20-02-008	coord	SSA Freeze Ruling - reply - call w/ CforAT (PG) re coordinating	6/14/24	0.25
Ashley Salas	R20-02-008	FZ_WLESS/WLINE	SSA Freeze Ruling - reply - draft - re separate SSAs for wireless and wireline service	6/14/24	2.00
Ashley Salas	R20-02-008	SSA_AFFORD	SSA Freeze Ruling - reply - draft - re LifeLine wireline copay affordability	6/14/24	1.50
Ashley Salas	R20-02-008	AEVS	TPA/ Consumer Working Group Call re implementation of Medi-Cal enrollment checks	7/10/24	0.50
Ashley Salas	R20-02-008	FYP_TRANSITION	Foster Youth - call w/ CM, CD (CW, HK, MV) re transition	8/1/24	0.50
Ashley Salas	R20-02-008	FYP_TRANSITION	Foster Youth - call w/ CM re follow up from call w/ CD, next steps	8/1/24	0.25
Ashley Salas	R20-02-008	coord	Foster Youth Pilot - disc w/ AG, CM re meeting with Youth Law Center	9/19/24	0.25
Ashley Salas	R20-02-008	coord	Foster Youth - disc w/ AG re potential meeting with Voices for Children	10/22/24	0.25
Ashley Salas	R20-02-008	FYP_TRANSITION	Foster Youth - call w/ AG, CM, Youth Law Center re Foster Youth Pilot Transition, pilot background	10/22/24	1.00
Ashley Salas	R20-02-008	FYP_TRANSITION	Call w/ AG re next steps on Foster Youth Pilot	10/28/24	0.25
Ashley Salas	R20-02-008	FZ_GO153	SSA PD - draft opening comments re suspension of GO 153, Section 8	11/20/24	1.00
Ashley Salas	R20-02-008	FZ_SUNST	SSA PD - draft opening comments re sunset date for freeze	11/20/24	1.00
Ashley Salas	R20-02-008	SSA_AFFORD	SSA PD - draft opening comments re LifeLine wireline copay affordability	11/20/24	0.75
Ashley Salas	R20-02-008	SSA_AFFORD	SSA PD - incorporate AG's edits re LifeLine wireline copay affordability	11/21/24	0.25
Ashley Salas	R20-02-008	FYP_TRANSITION	Foster Youth - disc w/ AG re end of T-Mobile's services	11/26/24	0.25
Ashley Salas	R20-02-008	FYP_TRANSITION	Foster Youth - disc w/ CM, AG re provider transition, loss of phone numbers	12/3/24	0.25
Ashley Salas	R20-02-008	Comp	icomp - call w/ AG re SSA comp request	1/17/25	0.25
Ashley Salas	R20-02-008	Comp	icomp - disc w/ AG re hours	2/3/25	0.25
Ashley Salas	R20-02-008	AEVS	TPA/ Consumer Working Group Call re statistics on CalFresh and Medi-Cal checks for eligible	2/12/25	0.50
Ashley Salas	R20-02-008	FYP_APP	Consumer/ TPA Working Group Call re Foster Youth Pilot application process and handset shipping	3/12/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot Staff Proposal - review for procedural issues	4/16/25	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Staff Proposal - issue spot re consumer needs	4/17/25	0.75
Ashley Salas	R20-02-008	LLBBAND_SCHG	Broadband Staff Proposal - issue spot re funding mechanism and budget	4/17/25	1.00
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Staff Proposal - issue spot re adoption gap	4/17/25	0.75
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Staff Proposal - issue spot re ISP voluntary low-cost plans	4/18/25	0.50
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Staff Proposal - issue spot re end of ACP and broadband subscription statistics	4/18/25	0.50
Ashley Salas	R20-02-008	LLBBAND_PROVIDER	Broadband Staff Proposal - issue spot re provider participation in LifeLine	4/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Staff Proposal - call w/ CD re questions on staff proposal	4/18/25	0.75
Ashley Salas	R20-02-008	LLBBAND_PFM	Deny SSA PFM PD - issue spot	4/21/25	0.50
Ashley Salas	R20-02-008	coord	Deny SSA PFM PD - disc w/ PAO (SM), AG re coordinating	4/24/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot SP - disc w/ AG re next steps	5/8/25	0.25
Ashley Salas	R20-02-008	FED	Broadband Pilot - issue spot re federal funding	5/9/25	0.25
Ashley Salas	R20-02-008	FED	Broadband Pilot - call w/ AG re strategy on federal funding issues	5/9/25	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot - issue spot re minimum service standards for broadband	5/9/25	0.50
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - call w/ AG re strategy on legis issues	5/9/25	0.50
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot - email w/ AG re divisions of labor and internal deadlines	5/9/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot - issue spot re program streamlining	5/9/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SSA	Broadband Pilot - call w/ AG re strategy on subsidy issues	5/9/25	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot - disc w/ AG re bundling - strategy	5/12/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PROVIDER	Broadband Pilot - issue spot staff proposal re provider participation	5/12/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PROVIDER	Broadband Pilot - draft opening comments re low-cost plan mandate	5/13/25	1.75
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot - draft opening comments re broadband MSS	5/14/25	1.00
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot - draft opening comments re MSS	5/14/2025	0.50
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - draft opening comments re legis issues	5/14/25	0.75
Ashley Salas	R20-02-008	LLBBAND_PROVIDER	Broadband Pilot - call w/ AG re mandatory participation proposal	5/14/25	0.50
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot - draft opening comments re program streamlining	5/14/25	0.50
Ashley Salas	R20-02-008	FED	Broadband Pilot - draft opening comments re federal funding issues	5/15/2025	0.50
Ashley Salas	R20-02-008	LLBBAND_SSA	Broadband Pilot - draft opening comments re SSA	5/15/2025	1.00
Ashley Salas	R20-02-009	TRIBAL	Broadband Pilot - draft opening comments re make up for non-ETC Tribal providers	5/15/2025	0.50
Ashley Salas	R20-02-008	FED	Broadband Pilot - opening - edit section re federal funding issues	5/16/2025	0.25
Ashley Salas	R20-02-008	LLBBAND_ELIG	Broadband Pilot - opening - edit section re subscriber eligibility	5/16/2025	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot - opening - edit section re broadband MSS	5/16/2025	0.50
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - opening - edit section re legis issues	5/16/2025	0.25
Ashley Salas	R20-02-008	LLBBAND_PROVIDER	Broadband Pilot - opening - edit section re low-cost plan mandate	5/16/2025	0.25
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot - opening - edit section re program streamlining	5/16/2025	0.50
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot - opening - disc w/ AG re next steps on drafting	5/16/2025	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot - opening - edit section re make up for non-ETC Tribal providers	5/16/2025	0.25
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot - opening - edit section re revising comments	5/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - reply - disc w/ AG re strategy, division of labor	5/22/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - issue spot opening comments re need for pilot	5/25/25	0.75
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - issue spot opening comments re CPUC authority to enact pilot	5/25/25	0.50
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - call w/ AG re division of drafting, strategy re need for pilot	5/25/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - call w/ AG re division of drafting, strategy re legislative issues	5/25/25	0.25

**R.20-02-008 (LifeLine) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot - reply - draft section re MSS	5/27/25	0.50
Ashley Salas	R20-02-008	LLBBAND_PROVIDER	Broadband Pilot - reply - draft section re provider participation	5/27/25	0.50
Ashley Salas	R20-02-008	LLBBAND_SCHG	Broadband Pilot - reply - draft section re funding issues	5/27/25	0.75
Ashley Salas	R20-02-008	LLBBAND_SSA	Broadband Pilot - reply - draft section re subsidy amount and number per household	5/27/25	0.75
Ashley Salas	R20-02-008	LLBBAND_SSA	Broadband Pilot - disc w/ Small LECS (PR) re \$20/ \$30 proposal	5/27/25	0.25
Ashley Salas	R20-02-008	FED	Broadband Pilot - reply - edit and revise sections re federal funding issues	5/28/25	0.50
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot - reply - edit and revise sections re MSS	5/28/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot - reply - edit and revise sections re threshold issues	5/28/25	0.50
Ashley Salas	R20-02-008	LLBBAND_PROVIDER	Broadband Pilot - reply - edit and revise sections re provider participation	5/28/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SP	Broadband Pilot - reply - disc w/ AG re strategy, next steps	5/28/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SSA	Broadband Pilot - reply - edit and revise sections re subsidy amount and number	5/28/25	0.50
Ashley Salas	R20-02-008	FED	Broadband Pilot PD - review and issue spot re federal funding	7/25/25	0.25
Ashley Salas	R20-02-008	LLBBAND_ELIG	Broadband Pilot PD - review and issue spot re one per household rule	7/25/25	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot PD - review and issue spot re proposed MSS	7/25/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SSA	Broadband Pilot PD - review and issue spot re subsidy issues	7/25/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PD	Broadband Pilot PD - call w/ AG re opening comments, division of drafting	7/31/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, DTV (MR) re next steps	7/31/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ Yurok (AM), AG re next steps	7/31/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ Hoopa Valley (LJ, MD, AC), AG re next steps	7/31/25	0.25
Ashley Salas	R20-02-008	coord	Broadband Pilot PD - disc w/ AG re CETF's request to coordinate	8/11/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot PD - disc w/ MT, AG, AT, IH re CETF's implications for SB 716 (Durazo)	8/11/25	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot PD - revise AG's section re voice MSS	8/13/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - draft sections re Tribal enhancement and subsidy	8/13/25	2.50
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, DTV (MR) re Tribal issues	8/13/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, Hoopa Valley (LJ, MD, AC) re Tribal issues	8/13/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, Yurok (AM) re Tribal issues	8/13/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, DTV (MR) re Tribal issues	8/14/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, Hoopa Valley (LJ, MD, AC) re Tribal issues	8/14/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, Yurok (AM) re Tribal issues	8/14/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Broadband Pilot PD - disc w/ AG, DTV (MR) re Tribal issues	8/14/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PD	Broadband Pilot PD - disc w/ AG re parties' opening comments, next steps	8/15/25	0.25
Ashley Salas	R20-02-008	TRIBAL	Federal make-up call w/ AG, CD staff	8/15/25	0.50
Ashley Salas	R20-02-008	LLBBAND_DATA	Broadband Pilot PD - issue spot opening comments re reporting requirements	8/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_DATA	Broadband Pilot PD - reply comments - revise draft section re data reporting	8/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot PD - issue spot opening comments re MSS & supported technology	8/18/25	0.50
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot PD - reply comments - revise draft sections re MSS	8/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_MSS	Broadband Pilot PD - reply comments - revise draft section re 911 access	8/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PD	Broadband Pilot PD - call w/ AG re strategy, priority topics for reply comments	8/18/25	0.50
Ashley Salas	R20-02-008	LLBBAND_PILOT	Broadband Pilot PD - reply comments - revise draft sections re goals/benefit of pilot	8/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SCHG	Broadband Pilot PD - issue spot opening comments re funding issues	8/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_SSA	Broadband Pilot PD - reply comments - revise draft section re equipment costs	8/18/25	0.25
Ashley Salas	R20-02-008	LLBBAND_PD	Broadband Pilot PD - disc w/ AG re Rev. 1, next steps	8/26/25	0.25
				<b>Ashley Salas Total</b>	<b>165.00</b>
Brenda D. Villanueva	R20-02-008	SSA_MSS_WLESS	emails w/ A. Salas, re: submitted advice letters	2/9/24	0.25
Brenda D. Villanueva	R20-02-008	coord	(PFM) email w/ Cal Advocates (AM), re: coord for PFM strategy	4/17/24	0.25
Brenda D. Villanueva	R20-02-008	LLBBAND_DUR	(PFM) email w/ A. Green, re: strategy for TURN positions - duration of modification	4/17/24	0.25
Brenda D. Villanueva	R20-02-008	LLBBAND_SCHG	call w/ A. Salas re: Cal Advocates strategy for broadband PFM, prior TURN positions	4/18/24	0.25
Brenda D. Villanueva	R20-02-008	LLBBAND_PFM	(PFM) review Cal Advocates and TURN PFM	4/23/24	0.50
Brenda D. Villanueva	R20-02-008	LLBBAND_PFM	(PFM) email w/ A. Salas re: Cal Advocates and final edits to TURN PFM	4/23/24	0.25
				<b>Brenda D. Villanueva Total</b>	<b>1.75</b>
Christine Mailloux	R20-02-008	FYP_TRANSITION	(Foster Youth) Meeting with CD staff and A. Salas re: program transition to Maximus and accounting for closeout of iFoster	8/1/24	0.50
Christine Mailloux	R20-02-008	FYP_TRANSITION	(Foster Youth) Discussion with A. Salas re: transition monitoring	8/1/24	0.25
Christine Mailloux	R20-02-008	FYP_TRANSITION	Meeting with A. Salas, A. Green and Youth Law Center re: Foster Youth LifeLine program, including meetings with Maximus and Commission and next steps for the implementation of new pilot	10/22/24	1.00
Christine Mailloux	R20-02-008	FYP_TRANSITION	Email discussion re: foster youth pilot issues including number porting for pilot participants	12/3/24	0.25
				<b>Christine Mailloux Total</b>	<b>2.00</b>
Kori Cordero	R20-02-008	GO153_SSN	Review and edit Draft Opening Comment to LifeLine GO 153 re SSN issue	11/3/25	0.25
Kori Cordero	R20-02-008	GO153_APP	Review and edit Draft Opening Comment to LifeLine GO 154 re VOIP operating authority	11/3/25	0.25
Kori Cordero	R20-02-008	GO153_VOIP	Review and edit Draft Opening Comment to LifeLine GO 155 re ways to apply to LifeLine	11/3/25	0.25
Kori Cordero	R20-02-008	GO153_LINKS	Review and edit Draft Opening Comment to LifeLine GO 156 re links	11/3/25	0.25
Kori Cordero	R20-02-008	GO153_PD	review other parties' GO 153 PD opening comments re other issues	11/4/25	0.50
				<b>Kori Cordero Total</b>	<b>1.50</b>
Leo Fitzpatrick	R20-02-008	SSA_MSS_WLESS	Discovery - meeting w/ A.Salas; J. Guyan, D. Perry, J. Heitmann (TruConnect) re: DR for SSA comments	1/8/24	1.00
Leo Fitzpatrick	R20-02-008	SSA_MSS_WLESS	Discovery - meeting w/ A.Salas, A.Green; J. Guyan, D. Perry, J. Heitmann (TruConnect) re: retail marketplace for SSA comments	1/18/24	1.00
Leo Fitzpatrick	R20-02-008	SSA_MSS_WLESS	Meeting w/ A.Salas, A.Green; J.Heitmann, J.Guyan (NALA), D.Perry (TruConnect) re: market rates	2/28/24	0.50
Leo Fitzpatrick	R20-02-008	SSA_MSS_WLESS	Discovery - prep for meeting w/ NALA/TruConnect re: TURN data request	2/28/24	0.25
Leo Fitzpatrick	R20-02-008	SSA_MSS_WLESS	Lifeline - discovery - review email disc w/ A.Salas, A.Green, G.Guyan, D.Perry, J.Heitmann (TruConnect) re: data request	3/22/24	0.25
				<b>Leo Fitzpatrick Total</b>	<b>3.00</b>
Robert Finkelstein	R20-02-008	FYP_ELIG	Review and revise AGreen draft of comments in response to staff proposal re database matching agreement	6/18/25	0.25
Robert Finkelstein	R20-02-008	FYP_NON-USAGE	Review and revise AGreen draft of comments in response to staff proposal re non-usage rule	6/18/25	0.25
Robert Finkelstein	R20-02-008	FYP_ELIG	Review and revise draft reply cmmnts of Agree re one per household rule	7/10/25	0.25
Robert Finkelstein	R20-02-008	FYP_NON-USAGE	Review and revise draft reply cmmnts of Agree re proposed non-usage rule	7/10/25	0.25
Robert Finkelstein	R20-02-008	LLBBAND_PD	Advise on next steps for revised PD	8/26/25	0.25
				<b>Robert Finkelstein Total</b>	<b>1.25</b>
Thomas Long	R20-02-008	FYP_ELIG	Rev/edit AG response to YLC PFM re changes to eligibility	3/20/25	0.50
Thomas Long	R20-02-008	FYP_NON-USAGE	Rev/edit AG response to YLC PFM re proposal on non-usage	3/20/25	0.25
Thomas Long	R20-02-008	FYP_ELIG	Rev/edit AG revisions to response to YLC PFM re eligibility	3/24/25	0.25
				<b>Thomas Long Total</b>	<b>1.00</b>

**Attachment 3**  
TURN Hours Allocated by Issue

Substantial Contribution	\$ 118,062.00
Intervention/Comp Compensation	\$ 4,218.13
Travel Time Compensation	\$ -
Expenses Compensation	\$ -
<b>Grand Total</b>	<b>\$ 122,280.13</b>

Revised March 2023

**Attachment 4**  
Commission Notice of Specific Support Calculation for 2025

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 1, 2024

To: California LifeLine Service Providers

**SUBJECT: NOTICE OF SPECIFIC SUPPORT CALCULATION FOR 2025**

This letter is to inform all California LifeLine service providers of the new Specific Support Amount (SSA) effective January 1, 2025.

**SSA Background**

In Decision (D.) 10-11-033, the California Public Utilities Commission (Commission) established a new California LifeLine subsidy methodology for calculating the Specific Support Amount (SSA). The SSA is calculated by taking 55% of the highest basic flat rate reported by the four Carriers of Last Resort (COLRs) to the Commission as of August 1<sup>st</sup> of the previous year. The new SSA goes into effect on January 1<sup>st</sup> of the following year.

**SSA Calculation**

As of July 31, 2024, the highest basic flat service rates reported by the four COLRs are as follows:

AT&T California	\$37.50
Consolidated Communications of California Company	\$32.44
Frontier California Inc.	\$24.50
Frontier Communications of the Southwest Inc.	\$23.50

Of the four, AT&T's rate of \$37.50 represents the highest basic flat rate service amount. Therefore, using the formula set forth in D.10-11-033, the SSA would be computed as follows:

$$\$37.50 \times 55\% = \$20.625, \text{ rounded to } \underline{\$20.65} \text{ (the nearest \$0.05)}$$

**Proposed Decision on SSA Freeze**

On November 1, 2024, the Commission issued a Proposed Decision (PD) freezing the SSA at \$19.00. The timeline for this PD is as follows:

- December 5, 2024: The PD is scheduled for a vote.
- If approved: The SSA will remain at \$19.00, effective January 1, 2025, until the Commission modifies the SSA methodology.

- If NOT approved, starting January 1, 2025, the SSA will go up to \$20.65 until the Commission revises the SSA methodology. Per D.10-11-033, Ordering Paragraph 24, service providers are required to reduce customer bills by the total reimbursement amount received from the California LifeLine Program. In addition, all reductions must be clearly itemized on customer bills as a separate line item or its equivalent.

### **Advice Letter Guidance for 2025**

Service providers must file an advice letter (AL) if the SSA impacts either their tariffs or schedule of rates and charges. If the SSA results in a rate increase for customers, providers must provide a 30-day customer notice in compliance with disclosure requirements set forth in General Order 153, Section 4.7. Providers should submit a draft customer notice to the Commission's Public Advisor's Office for review and approval at [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov), with a copy to Tina Lee at [tina.lee@cpuc.ca.gov](mailto:tina.lee@cpuc.ca.gov).

Providers must continue to submit ALs for the new SSA. However, if the Commission approves the SSA freeze at \$19, providers must ensure that any proposed changes align with the SSA freeze. Any ALs requesting approval for LifeLine service changes based on the SSA amount of \$20.65 will be rejected.

If you have any questions regarding this matter, please contact Tina Lee by phone at (415) 703-2285 or via e-mail at [tina.lee@cpuc.ca.gov](mailto:tina.lee@cpuc.ca.gov).

Sincerely,



Robert Osborn  
Director, Communications Division

Revised March 2023

**Attachment 5**  
LifeLine Active Subscriber Statistics (January 1, 2025)

# Connecting



## Program Participation – Active LifeLine Subscribers

Active LifeLine Subscribers – *January 1, 2025*

- Wireless: 1,550,966
- Wireline: 108,856
- Total: 1,659,822

**40.85% increase of total subscribers**

Active LifeLine Subscribers – *January 1, 2024*

- Wireless: 1,039,496
- Wireline: 138,899
- Total: 1,178,395

Revised March 2023

**Attachment 6**  
Résumé of Kori Cordero

# **Kori Cordero**

kcordero@turn.org | 360 Grand Ave. #150, Oakland, CA 94610 | (415) 929-8876

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Over a decade of law and policy experience, including as an attorney, tribal government executive appointee, telecommunications CEO, senior advisor, litigator, and training and technical assistance provider regarding telecommunications law and policy, energy law and policy, grant management and compliance, corporations law and management, human resources policies, employment law, environmental and cultural resource protection law and policy, land use, tribal justice systems, wellness courts, youth law and policy programs, anti-trafficking policy, child welfare systems, tribal governance, government-to-government collaborations, tribal traditional and customary law, federal Indian law, and compliance with federal laws.

## **EXPERIENCE**

### **The Utility Reform Network (TURN)**

*Telecom Advocacy Managing Attorney*

**Sep. 2025 – Present**

- Supervise TURNs Telecom Department and support staff including assigning work, reviewing and editing filings, providing trainings, and developing internal protocols for streamlining and tracking work while maintaining an equitable workload across all staff.
- Create and track TURN policy positions that guide TURNs work before the California Public Utilities Commission (CPUC), Federal Communications Commission, and other forums.
- Represent consumers in telecommunications related proceedings before the CPUC.
- Represent consumers in federal and state law and policy forums.
- Prepare department budgets, staff retreat agendas, annual reports, and talking points.
- Lead negotiator for TURNs Telecom Department.

### **The Circle Law Group P.C.**

*Senior Attorney*

**January 2025 – August 2025**

- Provide legal advice to tribal government and tribal corporation clients on a wide variety of subjects and matters.
- Support client efforts related to several pieces of California legislation impacting tribal tax, tribal cultural resources, housing, California Environmental Quality Act, and the California budget; including, providing strategy advice, drafting services, research services, and coordination with lobbyists and attorney work groups.
- Draft client grant applications resulting in \$500,000 in funding for telecommunications efforts.
- Conduct novel legal and historical research regarding California Indian water rights, energy projects, utility rights of way, utility company land transactions, and participate in related intergovernmental negotiations and consultations with tribal, federal, state, nonprofit, and utility entities.
- Coordinate with the California Native American Heritage Commission, California State Parks, local jurisdictions and the California Department of Justice regarding complex tribal cultural resource laws.

### **U.S. Environmental Protection Agency**

*Senior Tribal Advisor*

**November 2023 – December 2024**

- Advise on Tribal issues impacting Region 9, national Tribal policies, implementation of Biden Administration initiatives.
- Provide advice and counsel to the Regional Administrator, Deputy Regional Administrator, and Senior Executive Service officials on program development, planning, and activities impacting Tribes.
- Assists regional and national leadership in understanding Tribal perspectives and needs, and in communicating the Region's Tribal policies, strategies, programs, perspectives, and initiatives to Tribes and work to strengthen the partnership between the EPA and Tribes.
- Lead and/or advise on government-to-government consultations with federally recognized Tribes. Prepare and conduct substantive briefings for senior leadership at U.S. EPA headquarters, Tribal elected leadership, the White House, the press, and federal, state, and local legislators.
- Review and edit sensitive press releases on Tribal issues and Tribal enforcement matters.

## **Yurok Tribe**

**July 2019 – November 2023**

*Deputy General Counsel (Sep. 2022 – Oct. 2023) | Chief Executive Officer of Yurok Telecommunications Corporation (May 2023 – Nov. 2023) | Authorized Representative of Yurok Telecommunications Corporation (May 2022 - May 2023) | Self-Governance Director (Mar. 2022 – Sep. 2022) | Associate General Counsel (Jul. 2019 – Feb. 2022)*

Served as legal counsel for the Yurok Tribal government and prepared legal briefs, administrative comment letters, memos, contracts, and agreements applying Yurok law, federal Indian law, and California law. In addition, I also served as outside legal counsel for several Yurok Tribal owned corporations, including the Yurok Telecommunications Corporation (Yurok Telecoms) and assisted with corporate policies, regulatory compliance, labor issues, grant management, infrastructure deployment, business contracts, and contractor oversight.

## **Supervisory Experience**

- Supervised Associate General Counsels, paralegals, and legal interns for the Yurok Tribe Office of the Tribal Attorney (“OTA”), including assigning work, reviewing and editing filings, providing trainings, and developing internal protocols for streamlining and tracking work while maintaining an equitable workload across all staff.
- Developed a comprehensive litigation guide, litigation process, settlement structure, litigation templates, and data tracking for civil cases handled by OTA.
- Managed litigation by outside counsel to ensure continued consistency with OTA standards, Yurok law and policy, and Yurok Tribal Council priorities and advocacy positions.
- Lead OTA staff meetings, OTA-Tribal Council litigation updates, OTA-Executive Director strategy meetings, and represented OTA at internal governance meetings, inter-departmental working groups, and multi-jurisdiction investigations on behalf of the department.
- Prepared OTA department budgets, staff retreat agendas, annual reports, and community presentations.
- Managed outside counsel, including, contract creation, substantive review, budgets, and payments.
- Managed Yurok Tribe and Yurok Telecoms attorneys, outside counsel, and contractors.

## **Telecommunications Experience**

- Legal support for the Yurok Tribe’s Information Technology Department including non-disclosure agreements, multi-million-dollar telecommunications infrastructure projects, strategic planning, negotiations with local telecommunications providers, internal technology policy, and drafting administrative comments on state utilities, tribal policy, broadband funding opportunities, and the California State Broadband Action Plan.
- Worked closely with the Yurok Tribe Chief Financial Officer and financial consultants on evaluating potential acquisitions and mergers, contractor fraud, alleged embezzlements, revising pay scales for equity and retention, and drafting business plans for government and nongovernment utilities.
- Created Yurok Telecoms and served in multiple positions, including outside counsel, executive management staff, and Chief Executive Officer.
- Managed over \$66 million in telecommunication funding on behalf of the Yurok Tribe and Yurok Telecoms.
- Lead negotiator between Yurok Telecoms and the California Middle Mile Broadband project, resulting in a signed Letter of Intent with the California Department of Technology on all key terms.
- Lead for all Yurok Telecoms infrastructure projects including management of IT and Telecom staff, attorneys, and contractors.
- Lead attorney for the Yurok Tribe’s utilities work, CPUC proceedings, and CPUC policy work on broadband, energy, and utility issues.
- Manage broadband consultations and collaborations with the CPUC, FCC, NTIA, and nonprofits on behalf of the Yurok Tribe and Yurok Telecoms.

## **Litigation Experience**

- Conducted and supervised litigation on behalf of the Yurok Tribe in Yurok Tribal Court, California superior courts, federal bankruptcy proceedings, administrative law proceedings, mediations, and federal appellate proceedings; including, drafting and filing pleadings and motions, conducting legal research, managing discovery, preparing expert witnesses, preparing affidavits, conducting opening/closing arguments, conducting cross-examinations, and preparing

court orders.

- Managed all of the Yurok Tribe's participation in CPUC proceedings.
- Lead attorney for collaborations with the Humboldt and Del Norte District Attorneys' Offices for state crimes occurring on the Yurok Reservation during 2020.
- Managed all the Yurok Tribe's opioid and vaping litigation cases with outside legal counsel, including cases against Purdue, Insys, Juul, and McKinsey & Company.
- Served as Tribal Prosecutor for the Office of the Tribal Attorney for civil cases before the Yurok Tribal Court.
- Lead attorney for the Yurok Tribe in the Frontier Transfer Proceeding (A.20-05-010) before the CPUC and approximately seven other proceedings impacting the Yurok Tribe on telecoms, energy, and funding issues.
- Served as supporting attorney on *J.H. v. Del Norte County Superior Court* an Indian Child Welfare Act extraordinary writ case in the California Court of Appeal.
- Attorney for the Yurok Tribe in Humboldt and Del Norte counties ICWA cases before the Humboldt County Joint Jurisdiction Court and Del Norte County Joint Jurisdiction Family Wellness Court.
- Lead attorney for civil cases before the Yurok Tribal Fishing Court.
- Lead attorney for Yurok Tribe exclusion cases before the Yurok Tribal Court, including cases regarding homicide, arson, and assault with a deadly weapon.

### ***Legislative and Policy Experience***

- Lead staffer and negotiator for Yurok Tribe external tribal, federal, and state legislative, policy, government-to-government, and consultation efforts as the Director of the Office of Self Governance "OSG Director."
- Monitored and analyzed policy and legislation that impacts the Yurok Tribe in the areas of broadband, infrastructure, energy, and relief funding, and all tribal-serving federal and state departments and worked with tribal, state, and federal partners to draft, review, and advocate for (or against) various legislative and policy efforts.
- Developed and maintained positive working relationships with key legislators and their staff on issues impacting the Yurok Tribe's law and policy priorities including U.S. Rep. Huffman, CA Senator McGuire, CA Assemblymember Ramos, and CA Assemblymember Wood.
- Developed and maintained positive working relationships with California public officials, including CPUC Commissioners and staff, CEC Commissioners and staff, Senior Advisors to Governor Newsom, Governor Newsom's Cabinet Members, and many state agencies and departments.
- Legal support for the Yurok Tribe's Human Resources Department on confidential personnel issues and policy development; including the employee complaint policy, protection order policy, administrative leave policy, social media policies, workplace harassment and bullying policies, COVID-19 testing policies, high-profile employee terminations, employee criminal/civil investigations, and other COVID-19 issues.
- Deputy Legal Officer for the Yurok Tribe COVID-19 Incident Command responsible for drafting public health orders, drafting and reviewing ordinances, and public health orders.
- Extensive contract work, including employment, consultant, leases and confidentiality contracts.
- Drafted, reviewed and/or approved press releases and other media on behalf of the Yurok Tribe and its wholly-owned corporations in collaboration with the senior staff and the Yurok Tribe press team.

### **Tribal Law and Policy Institute, West Hollywood, California**

*Tribal Justice Specialist (Aug. 2015 – June 2019) Tribal Legal Fellow (Aug. 2014 – Aug. 2015)*

**August 2014 – June 2019**

- Co-Director of TLPI's inaugural Tribal Youth Program Resource Center grant project.
- Lead staffer that managed over \$3 million in various grants, sub-awards, and contracts, including supervisory responsibilities for attorney and non-legal consultants.
- Provided training and technical assistance to federally recognized Tribes developing or enhancing justice systems, court systems, victim services, Tribal-state collaborations, Tribal-county collaborations, and youth-serving Tribal programs.
- Researched, drafted, and delivered diverse presentations, trainings, and briefs concerning Tribal law, federal Indian law, and federal grant management.
- Served on management team responsible for development and implementation of the organization's strategic plan, fundraising, and marketing.

**UCLA School of Law, Los Angeles, California***Research Assistant for Professor Angela Riley***Spring 2014**

- Assisted members of the Indian Law and Order Commission and Partners for Justice: UCLA Institute on Criminal Law in Indian Country with their symposium. Assisted the American Indian Studies Center in its development and implementation of the Good Native Governance conference at UCLA.
- Conducted legal and academic research.

**Pascua Yaqui Office of the Prosecutor, Tucson, Arizona***Law Clerk***June 2013 – August 2013**

- Assisted counsel, Tribal Council, and Center for Court Innovation staff on a federal grant project to reform the Child Welfare system including their 2014 site visit and created a child welfare database.
- Assisted counsel with juvenile and child welfare cases.

**San Bernardino County Office of the Public Defender, Victorville, California***Law Clerk***June 2013 – Spring 2014**

- Assisted counsel with felony and misdemeanor criminal cases. Drafted and edited memos and filings, interviewed in custody and OR clients, completed transcripts, drafted motions and conducted research.

**EDUCATION****UCLA School of Law, Los Angeles, California; J.D., May 2014**

*Activities:* Native American Law Student's Association, *Member* (2011-14), *Vice President* (2012-13), *Outreach/Recruitment* (2013-14), *Amicus Brief Writer* (2013), *NNALSA Moot Court* (2014), *La Raza*, *Member* (2011-14), *Peer Mentor* (2012-14)

**UC Riverside, Riverside, California; B.A., Political Science, June 2010****BAR ADMISSIONS**

Yurok Tribe, California, Pascua Yaqui

**PROFESSIONAL ACTIVITIES****American Civil Liberties Union —Northern California Chapter *Board Member*****January 2022 – January 2025**

- Community Engagement and Program Advisory Committee, *Member*
- Legal Committee, *Member*

**American Bar Association *Member*****April 2015 – 2024**

- Commission on Sexual Orientation and Gender Identity, *Commissioner*,
- Civil Rights and Social Justice, *Native American Concerns Committee, Member and Co-Chair*, Aug. 2015 – Present
- Young Lawyers Division, *NNABA Delegate*, July 2015 - 2020
- Judicial Division, *Tribal Courts Council, Member*, Apr. 2015 – 2020
- ABA publication “The Equalizer” *co-editor*, Aug. 2017 – Aug. 2020

**National Native American Bar Association *Member, Board Member*****April 2015 – Present**

- Board Member, Apr. 2018 – 2019, April 2024 - Present
- Young Lawyers Committee, *Chair*, April 2017 – 2019,
- Young Lawyers Committee, *Member*, Apr. 2015 – April 2024

**California Indian Law Association *Member*****April 2015 – Present**