

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



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Order Instituting Rulemaking to Update the  
California LifeLine Program.

R. 25-11-005  
(Filed Nov. 26, 2025)

**COMMENTS OF VERIZON VALUE, INC. ON ADMINISTRATIVE LAW JUDGE'S  
RULING INVITING COMMENTS ON THE  
CUSTOMER PORTAL 2.0 STAFF PROPOSAL**

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June 17, 2026

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Verizon Value, Inc. f/k/a TracFone (“Verizon”) respectfully submits these comments on the California Public Utilities Commission (“CPUC” or “Commission”) Administrative Law Judge’s Ruling (the “ALJ Ruling”) Inviting Comments on the Customer Portal 2.0 Staff Proposal (the “Staff Proposal”).<sup>1</sup> The Staff Proposal’s new online application, eligibility renewal, and customer information portal (the “Portal”) for California LifeLine consumers is an important development to streamline LifeLine program access. These comments are timely filed pursuant to the Administrative Law Judge’s June 10 email ruling.<sup>2</sup> Verizon offers suggestions leveraging the Portal to achieve these goals and highlighting important areas the Commission should consider.

**DISCUSSION**

Verizon supports the Staff Proposal’s redeveloped Portal features. Verizon believes simplifying LifeLine eligibility determination and enrollment procedures are important goals to

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<sup>1</sup> Cal. Pub. Utils. Comm. *Administrative Law Judge’s Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal*, R.25-11-005 (June 3, 2026).

<sup>2</sup> *Email Ruling Clarifying Due Dates for Comments Responding to the Administrative Law Judge’s Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal*, R.25-11-005 (June 10, 2026) (setting the deadline for opening comments on June 17 and reply comments on July 1).

improve the consumer experience and ensure all eligible consumers can access LifeLine benefits. In particular, Verizon advocates considering how the Portal can work collaboratively with the National Verifier’s federal Lifeline enrollment system to improve access to both benefits. Since California’s National Verifier opt-out status ended in February, Verizon and others have reported fewer applicants successfully obtaining both benefits.<sup>3</sup> The Portal is an opportunity to address these changes.

Verizon addresses the Staff Proposal’s specific questions below:

**1. Does the proposed eligibility-first determination model appropriately balance consumer protection, program integrity, and operational efficiencies? Please explain your response.**

Verizon supports the eligibility-first determination model because it will improve LifeLine program integrity and operational efficiency. In particular, the Portal can leverage automatic eligibility determinations through database integrations with programs like CalFresh and Medi-Cal which make up more than 90% of California eligibility determinations.<sup>4</sup> This will save program resources and minimize administrative costs.

However, the Commission should take steps to minimize consumer harm in light of the new bifurcated state and federal Lifeline enrollment processes. Applicants eligible for both

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<sup>3</sup> See *Opening Comments of Verizon Value, Inc. on Administrative Law Judge’s Ruling Requesting Comment on Impacts on California LifeLine Program Resulting from Changes to Federal Policy and Permanent Disaster Relief Measures*, R.25-11-005 at 9 (Apr. 14, 2026) (“Since the parallel [state and federal] enrollment process launched on February 1, approximately 65% of Verizon’s new enrollments were only approved for California LifeLine. This is a significant drop compared to the 98% number of California subscribers eligible for both programs prior to February 1”); *AirVoice Wireless, LLC Comments on Administrative Law Judge’s Ruling Requesting Comment on Impacts on California LifeLine Program Resulting from Changes to Federal Policy and Permanent Disaster Relief Measures*, R.25-11-005 at 3 (Apr. 14, 2026) (“For new applications submitted in February and March 2026, only approximately 55% of applicants were successfully enrolled in and approved for both California LifeLine and federal Lifeline, while approximately 45% were approved only for California LifeLine. These results suggest that a substantial number of eligible or potentially eligible customers may not complete the second application due to process complexity or lack of awareness”).

<sup>4</sup> Cal. Pub. Util. Comm. *California LifeLine Program, 2024 Annual Report*, at 4 (March 2025) ([2024-lifeline-annual-report\\_final.pdf](#)).

programs may not be aware that they need to apply for both separately and may be confused by both applications requiring similar information. To ensure access to both benefits, the Commission should take steps to ensure the Portal properly informs consumers that California LifeLine eligibility determinations do not automatically confer federal Lifeline eligibility, and refers applicants to the federal program.

**2. Are there specific California low-income consumer populations that may experience challenges during the transition? If so, please describe those populations and recommend mitigation strategies for consideration**

Verizon anticipates certain groups may face challenges transitioning to the Portal. First, LifeLine consumers who do not participate in CalFresh or Medi-Cal typically require manual eligibility certification. While this is typically less than 5% of applicants, the Portal's emphasis on automated and self-guided enrollment may leave them without needed support. The Commission should ensure the Portal has clear guidance for manual verification, including specific instructions for submitting properly formatted documents, and provide resources for providers to train their enrollment support teams.

Senior citizens and persons with disabilities may also face challenges transitioning to the Portal. These applicants generally require more guided assistance to apply for LifeLine and could experience difficulty navigating the new system. Verizon strongly recommends providing support for service provider-guided application assistance so that no eligible customers fail to apply solely due to challenges adapting.

**3. Are the proposed timelines for post-approval enrollments sufficient for Service Providers (i.e., once the TPA has notified a Service Provider that an approved applicant has selected them, the Service Provider has 48 hours to 'accept' the applicant)?**

Verizon opposes the Staff Proposal's 48-hour window, and alternatively proposes a minimum 72-hour period for service providers to accept applicants. Verizon processes enrollments using real-time NLAD API connections that require complex data sharing to prevent duplicate enrollments. These fraud and duplication prevention systems take time and may be delayed by API latency due to large data transmissions between databases, which are outside of Verizon's control. Verizon believes a minimum 72-hour window minimizes the risk that delays outside of service providers' control prevents consumers from enroll with their service provider of choice, Verizon recommends the Commission implement a longer acceptance period.

**4. Are there operational challenges/risks Service Providers might encounter when transitioning to the Program-centric eligibility determination model? If so, please describe the challenges and recommend mitigation strategies for consideration.**

Verizon anticipates some operational challenges that may impact transitioning to the Program-centric eligibility determination model. First and most importantly, the Commission must ease the operational burden service providers face in processing customer enrollments in both the state and federal lifeline programs. Service providers currently process three enrollment types: California LifeLine-only, federal Lifeline-only, and dual enrollments. This requires significant resources and risks consumers being unable to maximize their eligible benefits if they do not understand the enrollment requirements. The Portal should mitigate this risk by working to match backend systems to federal eligibility and enrollment practices to minimize friction and support unified enrollment processes.

Second, the Portal's success depends on APIs connecting the California Third-Party LifeLine Administrator ("TPA") to USAC as well as the CalFresh, and Medi-Cal databases. Any API failures will increase the volume of manual verifications that service providers must complete and will reduce operational efficiency. Mitigating this concern requires the Commission invest in robust API development and testing for all core eligibility programs prior

to launch. Specifically, the Commission should facilitate time for the TPA and service providers to thoroughly test the Portal and address issues.

Finally, the Commission should be mindful of recent USAC changes that require service providers to update their systems to capture Benefit Qualifying Persons (BQP) data, which includes full first and last names, for Application ID enrollments. This new requirement introduced complexity that could lead to data errors if not done correctly. To minimize the risk that the Portal increases these errors, the Commission and TPA should deliver clear, standardized data requirements and comprehensive procedures addressing errors to ensure NLAD compliance.

**5. Is there a recommended transition period Service Providers anticipate needing to accommodate a successful transition to the proposed program-centric eligibility enrollment model through Portal 2.0?**

Verizon anticipates the scale and complexity of transitioning to the Portal will require a minimum three- to six-month transition period. This transition period is necessary to effectively address issues including developing user-friendly front-end user interface flows, integrating backend systems with the TPA's APIs, ensuring full compliance with NLAD requirements including BQP validation, and allow for thorough staging and production testing to minimize any consumer impacts prior to full launch. Verizon cannot offer a certain transition period until the Portal's features are finalized, but the Commission should proceed conservatively to minimize disruptions to LifeLine consumers.

**6. Are there any proposals or concepts that parties suggest staff consider in a future Trusted Partnership Staff Proposal?**

In addition to the aforementioned proposals, Verizon supports efforts making LifeLine enrollment easier and more efficient for consumers. While Verizon does not oppose developing a

Trusted Partnership framework, the Commission should ensure service providers have an active role as subscribers choose their LifeLine services. Successfully managing a LifeLine subscriber requires a collaborative relationship between that subscriber and their provider, and establishing this relationship early benefits all parties. While third parties can certainly play a role in expanding the LifeLine program, participating providers must remain actively involved.

**CONCLUSION**

Verizon looks forward to working with the Commission and other stakeholders to develop a Customer Portal 2.0 that better serves LifeLine consumers and streamlines the eligibility and enrollment processes.

Respectfully submitted this 17<sup>th</sup> day of June, 2026,

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