

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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



FILED

06/17/26
03:44 PM
R2511005

Order Instituting Rulemaking to Update the
California LifeLine Program.

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

OPENING COMMENTS OF

**CALAVERAS TELEPHONE COMPANY (U 1004 C)
CAL-ORE TELEPHONE CO. (U 1006 C)
DUCOR TELEPHONE COMPANY (U 1007 C)
FORESTHILL TELEPHONE CO. (U 1009 C)
HAPPY VALLEY TELEPHONE COMPANY (U 1010 C)
HORNITOS TELEPHONE COMPANY (U 1011 C)
KERMAN TELEPHONE CO. (U 1012 C)
PINNACLES TELEPHONE CO. (U 1013 C)
THE PONDEROSA TELEPHONE CO. (U 1014 C)
SIERRA TELEPHONE COMPANY, INC. (U 1016 C)
THE SISKIYOU TELEPHONE COMPANY (U 1017 C)
VOLCANO TELEPHONE COMPANY (U 1019 C)
WINTERHAVEN TELEPHONE COMPANY (U 1021 C)
("SMALL LECS")**

**ON ADMINISTRATIVE LAW JUDGE'S RULING INVITING COMMENTS ON THE
CUSTOMER PORTAL 2.0 STAFF PROPOSAL**

Patrick M. Rosvall
Chan Q. Vu
BRB Law LLP
492 9th Street, Suite 220
Oakland, CA 94607
Phone: (510) 955-1087
Email: qc@brblawgroup.com

Attorneys for the Small LECs

June 17, 2026

1 **I. INTRODUCTION.**

2 Pursuant to the assigned Administrative Law Judge’s June 2, 2026 Ruling Inviting
3 Comments on the Customer Portal 2.0 Staff Proposal (the “Ruling”) and the June 10, 2026 email
4 clarification regarding the June 3, 2026 date of the Ruling’s service, Calaveras Telephone
5 Company (U 1004 C), Cal-Ore Telephone Co. (U 1006 C), Ducor Telephone Company (U 1007
6 C), Foresthill Telephone Co. (U 1009 C), Happy Valley Telephone Company (U 1010
7 C), Hornitos Telephone Company (U 1011 C), Kerman Telephone Co. (U 1012 C), Pinnacles
8 Telephone Co. (U 1013 C), The Ponderosa Telephone Co. (U 1014 C), Sierra Telephone
9 Company, Inc. (U 1016 C), The Siskiyou Telephone Company (U 1017 C), Volcano Telephone
10 Company (U 1019 C), and Winterhaven Telephone Company (U 1021 C) (collectively, the “Small
11 LECs”) hereby submit opening comments on the Staff Proposal.¹ As longtime supporters of the
12 California LifeLine program, Small LECs appreciate the Commission’s efforts to modernize and
13 streamline the enrollment process, and the Small LECs offer these comments to identify ways in
14 which the new procedure can be integrated efficiently with the existing Lifeline protocols and
15 customer expectations.

16 There are many customers who will benefit from a more customer-driven enrollment
17 process. However, the Commission should also ensure that the traditional enrollment pathway
18 remains available for consumers, in perpetuity. A significant percentage of consumers, including
19 some of the most vulnerable populations, will likely be discouraged by the push to an online
20 application. For those individuals, it is critical that a paper application remain available. The
21 companies also appreciate that the Staff Proposal recognizes the need to align the state and federal
22 enrollment processes as much as possible given the FCC’s recent decoupling of those enrollment
23 processes.² In pursuit of that goal, the Small LECs recommend that Portal 2.0 include an
24 application programming interface (“API”) to the federal Lifeline system in order to ease the
25 application burden and reduce confusion for dual applicants to the federal and state programs. In

26

27 ¹ See *Ruling* at 2 (authorizing opening comments on “Customer Portal 2.0 Staff Proposal”).

28 ² *Staff Proposal* at 4 (citing *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Order, DA 25-965 (WCB 2025), available here: <https://docs.fcc.gov/public/attachments/DA-25-965A1.pdf>).

1 addition to these overall observations, the Small LECs offer the responses to the specific questions
2 posed by the Staff Proposal for the Commission’s consideration.

3 **II. THE STAFF PROPOSAL SHOULD CONFIRM THE AVAILABILITY OF PAPER**
4 **APPLICATIONS AND THE COMMISSION SHOULD CONSIDER SIMPLIFYING**
5 **THE LANGUAGE IN THE APPLICATION.**

6 As experienced stewards of the LifeLine program, the Small LECs have two primary
7 comments following their review of the Staff Proposal. *First*, the push to establish the customer
8 portal as the primary enrollment method creates the risk of alienating customers who do not have
9 the digital access or digital literacy to enroll online. *Second*, given that the Commission is
10 preparing to make significant changes to the customer portal, the Small LECs urge the
11 Commission to consider simplifying the language used in the LifeLine application, which has
12 proven itself to be confusing for customers to understand. Each recommendation is discussed in
13 detail below.

13 **A. The Proposed Portal 2.0 Model Should Clarify that the Traditional Paper**
14 **Application Will Still Be Available.**

15 The Commission should clarify that regardless of the significant updates to the portal, the
16 traditional paper application will be readily available to all customers, on a permanent basis. As
17 written, the Staff Proposal contemplates three enrollment paths that are intended to “accommodate
18 a variety of customer needs, preferences, and levels of digital access.”³ However, all three
19 enrollment paths feature Customer Portal 2.0 as the *only* entry point into the LifeLine program.⁴
20 While the Staff Proposal does reference the paper application, it is framed as a secondary method
21 of enrollment, rather than a parallel one. For example, the Staff Proposal mentions that applicants
22 “may also request that a paper application be mailed to them” only after explaining how customers
23 may contact the Third-Party Administrator (“TPA”) for step-by-step guidance on using Portal
24 2.0.⁵ In addition, the Staff Proposal only mentions in passing that “established channels” will still
25 be available so that service providers can request that the TPA initiate the paper application
26

27 ³ *Staff Proposal* at 5.

28 ⁴ *Staff Proposal* at 5-9, Figure 1 (showing that even for the provider-assisted options, the customer must apply through the portal).

⁵ *Staff Proposal* at 5.

1 process.⁶ While the Small LECs are encouraged by these statements, and recognize that the
2 proposed revisions to G.O. 153-A reflect the availability of the paper application, the Commission
3 should state directly that the paper application will remain permanently available as a parallel
4 enrollment path to the customer portal.

5 The Small LECs know firsthand that, due to lack of access to computers and/or limitations
6 on digital literacy, some customers rely on service providers for enrollment assistance. For
7 example, with the existing portal, many customers struggle with the documentation upload feature,
8 and the Small LECs expend significant time and effort to troubleshoot these issues with
9 customers. Moreover, while proposed Portal 2.0 framework is intended to align the state and
10 federal processes,⁷ the recent decoupling of the federal Lifeline and California LifeLine programs
11 has made these issues of access and digital literacy even more apparent. The Small LECs have
12 noted these issues in detail throughout this proceeding, but briefly, the “digital” nature of the
13 federal enrollment process has caused significant confusion and frustration among customers who
14 are either not comfortable navigating the online application or unable to access the application
15 outright, for lack of an appropriate device.⁸ Given the difficulties customers face with online-only
16 applications, preserving a paper application is critical to ensure that this critical program remains
17 accessible to all eligible customers.

18 **B. The Commission Should Simplify the Language of the LifeLine Application to**
19 **Reduce Confusion.**

20 The Small LECs believe that this is an opportune time to consider revising the language in
21 the LifeLine application itself to make it more user-friendly. The Small LECs’ customers have
22 struggled with the LifeLine application because the instructions in the application are lengthy and
23 the sheer volume of information can be overwhelming and difficult to understand. As a result,
24 customers prefer to contact the Small LECs directly for assistance, and the companies’ customer
25 service representatives (“CSRs”) dedicate significant time to walking customers through the
26

27 ⁶ *Staff Proposal* at 8.

28 ⁷ *Staff Proposal* at 5.

⁸ *Small LECs Opening Comments on Ruling Requesting Comment on Impacts from Changes to Federal Policy* (Apr. 14, 2026) at 2-3.

1 application. If the Commission were to revise the application to incorporate more plain language,
2 customers may feel more confident completing their applications without assistance. This would
3 reduce administrative costs and customer confusion, which will likely increase participation in the
4 LifeLine program. The Small LECs would be willing to work with Communications Division and
5 other stakeholders to implement these upgrades.

6 **III. THE COMMISSION SHOULD CLARIFY THE EFFECTS OF USING THE**
7 **PORTAL 2.0.**

8 The Staff Proposal describes three methods of enrollment using Portal 2.0, the first of
9 which appears to include the most significant changes to the current process.⁹ Through the first
10 pathway, a customer submits an application, receives approval from the TPA, and then selects a
11 service provider through the portal.¹⁰ Thereafter, the service provider is notified of the customer’s
12 selection and has 48 hours to accept the enrollment. However, the Staff Proposal does not
13 adequately describe the effect of such an acceptance. In particular, it is unclear whether a service
14 provider’s acceptance automatically creates a customer relationship and should be construed as the
15 customer’s acceptance of the companies’ terms of service. In itself, this procedure could create
16 concerns about cramming, so there should either be a clear rule confirming that the enrollment
17 process establishes a customer-carrier relationship by operation of law, or a further process where
18 customer consent to the terms of service is established.¹¹ The second pathway, whereby the
19 customer contacts the service provider directly to after receiving an enrollment identification
20 number (“Enrollment ID”), also requires clarification. The Small LECs offer their thoughts on the
21 second pathway in Section IV.4 of these comments, below.

22
23
24
25
26

27
28 ⁹ *Ruling* at 5-6.
¹⁰ *Ibid.*
¹¹ *See, e.g.*, Pub. Util. Code § 2890.

1 **IV. RESPONSES TO SPECIFIC QUESTIONS IN STAFF PROPOSAL.**

2 Building on the general comments on the Staff Proposal above, the Small LECs offer their
3 responses to the specific questions at the end of the Staff Proposal.

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

6 **Response:** The Small LECs believe that this updated process will generally decrease processing
7 times for LifeLine applications. In particular, the use of a portal will help make applications more
8 traceable, which should aid the Commission in its ability to assess waste, fraud, and abuse.
9 However, as discussed in Section II, above, the enrollment pathways via Portal 2.0 should not
10 eclipse the traditional enrollment pathway. As the Staff Proposal correctly identifies, the LifeLine
11 program strives to enable “broad consumer participation.”¹² With that in mind, it is critical to
12 preserve the paper application process to keep the program open to that consumers who do not
13 have a means to access an online application or the digital literacy to submit the online
14 application. The paper application should not be treated as secondary to the portal, but rather, as a
15 parallel and equally accepted enrollment pathway.

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

18 **Response:** Yes. There are two primary consumer populations who are likely to experience
19 challenges: (1) those who do not have access to a computer, smartphone, or similar device to
20 access the portal and (2) those who do not have the digital literacy to navigate Portal 2.0 in order
21 to successfully enroll in the program. In order to prevent any inadvertent alienation of these
22 vulnerable populations, the Commission should continue to promote the paper application as a
23 viable process for interested consumers. Critically, the paper application should remain a
24 permanent pathway, and it should not be “phased out” even after Portal 2.0 is implemented. The
25 LifeLine program should remain flexible for the benefit of all customers and potential participants.

26

27

28

¹² *Staff Proposal* at 3.

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

5 **Response:** The Small LECs request that the Commission specify that the 48-hour window to
6 accept LifeLine applications excludes weekends, federal holidays, and state holidays. The Small
7 LECs do not have personnel who can “accept” applicants on weekends or holidays, and without an
8 exemption for weekends and holidays, the 48-hour acceptance window would create significant
9 administrative burden and costs.

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

13 **Response:** The Small LECs have identified three operational challenges for the Commission’s
14 consideration:

15 *First*, the existing portal only allows customers to upload scanned documents or digital
16 files, such as PDFs. It notably does not allow a customer to upload a photo of their supporting
17 documentation. This makes eligibility verification difficult for customers who do not own a
18 scanner and only have paper copies of their documentation. The inability to upload documents in
19 a more “traditional” manner should not be a barrier for an otherwise eligible consumer, and as
20 such, the updated portal should correct this issue.

21 *Second*, the Staff Proposal includes a feature through which an applicant can compare
22 service providers and plans. While the Small LECs understand the intention behind this proposed
23 feature, it is unclear how the Commission will ensure that this tool will retain accurate
24 information. Service plans change frequently, and it would be difficult to ensure that the portal
25 had the latest information. Instead, the Small LECs recommend that the portal simply provide
26 external URL links to the service provider’s plan offerings, thereby allowing the consumer to
27 decide which provider to select.

28 *Third*, as previewed in the preceding section, the “Enrollment through Service Providers
After Receiving Enrollment ID” pathway raises significant operational challenges. Through this
pathway, a customer submits an application through Portal 2.0, and upon receiving an Enrollment

1 ID, the customer contacts the service provider directly to complete enrollment.¹³ The service
2 provider then uses “their established submission channel” to activate the applicant’s enrollment.¹⁴
3 However, this may require providers to make significant modifications to legacy software
4 applications. For example, modifications may be required in order to accommodate the
5 transmission of Enrollment IDs and other applicant information between a provider’s sales and
6 billing departments, and the TPA.

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

9 **Response:** As noted above, in order to accommodate the transmission of Enrollment IDs to
10 effectuate a provider’s “acceptance” of an applicant’s enrollment, providers will likely need to
11 make significant modifications to multiple legacy software applications. As such, the Small LECs
12 request an implementation date of six months after the date of the decision authorizing Portal 2.0.

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

15 **Response:** Given that the proposed Portal 2.0 represents a significant departure from the current
16 enrollment process, the Small LECs recommend that the Commission create marketing materials,
17 including instructional videos, brochures, and infographics that explain the changes to the
18 enrollment process. This would create a cache of consistent, Commission-approved materials that
19 providers can post on their websites to direct customers with questions. In particular, an
20 informational video has numerous use cases, as providers can use the video to prepare customers
21 who come to the office seeking enrollment assistance, and can also show the video at community
22 events promoting the LifeLine program.

23

24

25

26

27

28 ¹³ *Staff Proposal* at 7.

¹⁴ *Ibid.*

1 **V. CONCLUSION.**

2 The Small LECs appreciate the opportunity to comment on the Staff Proposal. By
3 incorporating the feedback above, the Small LECs believe that the program will become more
4 efficient, with fewer administrative burdens for service providers and consumers, while
5 maintaining the enrollment pathways that generate broad consumer participation.

6 Respectfully submitted on June 17, 2026, at Oakland, California.

7 Patrick M. Rosvall
8 Chan Q. Vu
9 BRB Law LLP
10 492 9th Street, Suite 220
11 Oakland, CA 94607
12 Phone: (510) 955-1087
13 Email: qc@brblawgroup.com

14 By: /s/ Chan Q. Vu
15 Chan Q. Vu

16 Attorneys for the Small LECs

17
18
19
20
21
22
23
24
25
26
27
28