

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



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R2511005

Order Instituting Rulemaking to Update the
California LifeLine Program.

Rulemaking 25-11-005
(Filed November 20, 2025)

**COMMENTS OF PACIFIC BELL TELEPHONE COMPANY
D/B/A AT&T CALIFORNIA (U 1001 C) ON THE ADMINISTRATIVE LAW JUDGE'S
RULING INVITING COMMENTS ON THE CUSTOMER PORTAL 2.0 STAFF
PROPOSAL**

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Dated: June 17, 2026

Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) (“AT&T”) hereby submits comments on the Administrative Law Judge’s Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal (“ALJ’s Ruling”) issued June 2, 2026.¹

I. INTRODUCTION

AT&T appreciates the opportunity to comment on the Customer Portal 2.0 Staff Proposal (“Staff Proposal”).² AT&T generally supports both a Commission-managed portal that provides LifeLine “eligibility determinations in near real time” for most applicants³ and continued availability of the paper application mail-in option.⁴ In these comments, AT&T requests additional information regarding the proposed 48-hour “acceptance” timeline, identifies operational challenges/risks associated with Customer Portal 2.0 and the separate state and federal application/renewal processes, and proposes a transition period of at least 12 months.

II. AT&T’s Response to Questions

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

AT&T reserves its right to respond to this question after review of the comments from other parties.

¹ *Administrative Law Judge’s Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal* (“ALJ’s Ruling”), Rulemaking (R.) 25-11-005 (June 2, 2026).

² ALJ’s Ruling at Attachment A (*Staff Proposal: California LifeLine Direct Enrollment and Renewal Application Processes Through Customer Portal 2.0 Release* (“Staff Proposal”).

³ Staff Proposal at 3.

⁴ *Id.* at 4-5, 8; *see also* ALJ’s Ruling, Attachment B (Commission Staff’s proposed edits to GO 153-A), Rule 4.2.1 at 7.

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.

Given the continued availability of the paper application mail-in option, as the Staff Proposal contemplates,⁵ challenges with the use of Customer Portal 2.0 can be mitigated with the mail-in option.

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)?

Commission Staff proposes “developing and implementing Customer Portal 2.0,”⁶ through which a LifeLine-eligible customer may select a LifeLine service provider.⁷ When a customer selects a LifeLine provider through Customer Portal 2.0,⁸ the Commission’s Third Party Administrator (“TPA”) will send that customer’s LifeLine enrollment information to the provider selected and that provider will have 48 hours to “accept” the enrollment.⁹

Based on the limited information in the Staff Proposal, AT&T submits that the 48-hour timeline is insufficient for service providers. First, the Staff Proposal does not explain how the TPA will notify a provider that it has been selected. If notice is sent by U.S. mail, for example, 48 hours to “accept” the enrollment would be inadequate. Second, the Staff Proposal does not specify when the 48-hour period begins. If notice is sent by email, it is unclear whether the

⁵ Staff Proposal at 4-5, 8; *see also* ALJ’s Ruling, Attachment B (Commission Staff’s proposed edits to GO 153-A), Rule 4.2.1 at 7.

⁶ Staff Proposal at 3.

⁷ *Id.* at 6.

⁸ AT&T understands the 48-hour timeline will apply to selections made over Customer Portal 2.0 and will not apply when applicants choose to complete enrollment directly with a service provider. *Id.* at 6-7 (proposing, “[o]nce the applicant selects their Service Provider through the portal . . . [t]he Service Provider will have forty-eight (48) hours to accept the enrollment.”).

⁹ *Id.* at 6.

period starts when the email reaches the provider's inbox or when the provider reads it. Third, the Staff Proposal does not address weekends or state and federal holidays. If the TPA sends notice on a Friday afternoon, for instance, the provider may have little practical opportunity to respond on time. Fourth, the Staff Proposal neither defines what constitutes "acceptance" nor explains how a provider must communicate acceptance to the TPA. It is unclear whether a reply email agreeing to "accept" the enrollment is enough, whether the provider must complete the customer's enrollment, or whether some other standard applies. Fifth, the Staff Proposal does not address what happens if a provider cannot accept the enrollment (as opposed to not accepting the enrollment within the time required), or what the notice to the LifeLine applicant would state if the provider either cannot or does not accept the enrollment.¹⁰

Accordingly, Commission Staff should provide additional information addressing these concerns, as well as any issues raised by other service providers, so providers can meaningfully evaluate the proposed 48-hour timeline. At a minimum, AT&T recommends that the Commission (a) extend the timeline to 5 business days, beginning the day after the service provider receives the TPA's email notification and excluding weekends and state and federal holidays and (b) define acceptance to include a service provider's reply email to the TPA accepting the customer's LifeLine enrollment.

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.

See AT&T's response to Question 3.

¹⁰ *Id.* (proposing, "[i]f the Service Provider does not accept the enrollment within the forty-eight (48) hour period, the selection will be voided, and the applicant will receive a notification with a link that they may click to return to the portal and choose another Provider.").

In addition to the 48-hour timeline discussed above, service providers may face operational challenges/risks if the Commission adopts requirements governing how providers interact with customers. Commission Staff’s proposed rule revisions¹¹ would require a service provider contacted by a customer establishing voice service and indicating an interest in LifeLine to direct the customer to the LifeLine website to apply online while allowing the provider to initiate the paper application mail-in option as an alternative.¹² Although AT&T understands the Commission’s interest in encouraging use of Customer Portal 2.0, the Staff Proposal expresses Commission Staff’s intent to preserve the mail-in option.¹³ The Commission, therefore, should allow LifeLine service providers to inform customers of both application options—online and mail-in—so each customer may choose the option that best meets their needs.

In developing and implementing Customer Portal 2.0, the Commission should also ensure the portal makes applicants aware of the federal Lifeline program. As AT&T mentioned in

¹¹ AT&T noted discrepancies between existing GO 153-A rules and Commission Staff’s proposed edits as noted in Attachment B to the ALJ’s Ruling. For example, Commission Staff’s proposed edits to Rule 4.1.1 as noted in Attachment B suggest some added text to the rule that is currently in the existing rule. Also, for example, comparing Commission Staff’s proposed edits to Rule 4.2.2.2.2 (current Rule 4.2.1.2.1.2) in Attachment B with existing Rule 4.2.1.2.1.2 shows that “verbally” was removed from “If the Customer verbally indicates . . .” but was not identified as a proposed deletion in Attachment B.

¹² See ALJ’s Ruling, Attachment B (proposing, in relevant part, the following Commission Staff edits (as noted in underline by AT&T) to GO 153-A), Rule 4.1.1 at 6-7 (“If Customers indicate that they are interested in applying for California LifeLine, California LifeLine Service Providers shall direct the Customer to the Program’s website to complete the application. If needed, the Service Provider may assist the Customer with applying to the Program. Alternatively, the Service Provider may contact the California LifeLine Administrator to begin the California LifeLine Paper Application Process for the Customer in accordance with Section 4.2 of this General Order and the Timeline for Processing California LifeLine Qualifications (found at <https://www.californialifeline.com>).”) *but see id.* at 7 (not including option for service provider to contact the TPA to initiate the paper application/mail-in option in Rule 4.2.2 (current Rule 4.2.1) if customer declines to answer enrollment or income-related questions).

¹³ Staff Proposal at 4-5, 8; *see also* ALJ’s Ruling, Attachment B (Commission Staff’s proposed edits to GO 153-A), Rule 4.2.1 at 7.

previous comments,¹⁴ today, when a customer eligible for both lifeline programs fails to successfully enroll in or renew one of the lifeline programs, the resulting funding gap is often borne by the service provider (not the lifeline subscriber). To mitigate that risk, the Commission should include information on Customer Portal 2.0 explaining where eligible customers may learn more about the federal Lifeline program, including applying for or renewing the federal Lifeline benefit. For example, the Commission should add a brief statement immediately after customers submit their LifeLine application directing them to the federal Lifeline program website, such as:

You may also qualify for benefits under the federal Lifeline program. To learn more about or apply for the federal Lifeline program, visit <https://www.lifelinesupport.org/>.

The Commission should include similar messaging for customers manually completing the renewal process in Customer Portal 2.0¹⁵ and in renewal-related communications to LifeLine subscribers, including the “intent to approve” or “intent to deny” notices the TPA sends to subscribers.¹⁶ For example, subscribers subject to renewal should be reminded that renewing their California LifeLine enrollment does not renew their federal Lifeline benefit.

The Commission should consider brief messaging, such as:

If you are enrolled in the federal Lifeline program, renewing your California LifeLine benefit **does not** renew your federal Lifeline benefit. To learn more about renewing your federal Lifeline benefit, visit <https://www.lifelinesupport.org/recertify/>.

¹⁴ *Reply Comments of Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) to the Administrative Law Judge’s Ruling Requesting Comment on Impacts on California LifeLine Program Resulting from Changes to Federal Policy and Permanent Disaster Relief Requirements*, R.25-11-005 at 2 (Apr. 21, 2026).

¹⁵ Staff Proposal at 10.

¹⁶ *Id.*

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?

AT&T recommends a transition period of at least 12 months after the Commission issues a decision regarding Customer Portal 2.0. AT&T will need to develop and implement new processes to claim the customers who select AT&T during the application process. For example, if the applicant is an existing AT&T customer, AT&T would need to verify that the selected account can be enrolled in LifeLine. That review would include confirming that the customer's name matches the account and that the account type is eligible for LifeLine. On the other hand, AT&T would need to establish a new process for applicants who are not AT&T customers. This work must be completed and tested before any customer can be enrolled through Customer Portal 2.0, which AT&T anticipates will require at least 12 months.

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

At this time, AT&T has not identified any proposals or concepts to be considered.

III. CONCLUSION

For the foregoing reasons, AT&T respectfully requests that the Commission address the operational concerns identified above, adopt a reasonable business-day enrollment acceptance timeline, allow providers to inform customers about online and mail-in application options, provide clear guidance to customers on the separate LifeLine and federal Lifeline processes, and allow at least 12 months for transition to Customer Portal 2.0.

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Respectfully submitted,

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