

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



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Order Instituting Rulemaking to  
Update the California LifeLine  
Program.

Rulemaking 25-11-005

**COMMENTS OF THE CALIFORNIA BROADBAND & VIDEO ASSOCIATION ON  
ALJ RULING INVITING COMMENTS ON THE CUSTOMER PORTAL 2.0 STAFF  
PROPOSAL**

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Pursuant to the Administrative Law Judge's Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal issued June 3, 2026 (“Ruling”), and the Administrative Law Judge's Email Ruling Clarifying Due Dates for Comments issued June 10, 2026, the California Broadband & Video Association (“CalBroadband”) hereby submits these timely comments on the Customer Portal 2.0 Staff Proposal (“Staff Proposal”).

**I. INTRODUCTION**

The Ruling seeks comment on a Staff Proposal for a new Customer Portal 2.0 for LifeLine program enrollment.<sup>1</sup> This centralized online portal would provide eligibility determinations in near real time, strengthen protections against fraud, and increase transparency for consumers.<sup>2</sup> CalBroadband supports efforts to simplify the LifeLine application process and improve the enrollment experience for customers, service providers, and the Commission, including by allowing customers to obtain a LifeLine eligibility determination through Customer Portal 2.0 without first going through a service provider. However, some of the enrollment pathways

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<sup>1</sup> See Ruling at 1. The Staff Proposal addresses enrollment and renewal processes through Customer Portal 2.0 for the California LifeLine program but does not expressly address the California LifeLine Home Broadband Pilot program. CalBroadband requests confirmation that Customer Portal 2.0 would apply equally to enrollment and renewal for the California LifeLine Home Broadband Pilot program, and these comments are submitted with that understanding.

<sup>2</sup> Ruling, Attachment A at 3.

discussed in the Staff Proposal are more practical and more likely to succeed than others. Of the Staff Proposal's three options for LifeLine enrollment, the first option that involves selecting a provider through Customer Portal 2.0 should not be used. As discussed below, removing this option is critical to ensuring that the new portal streamlines enrollment without creating operational, legal, or customer-experience problems that could discourage participation or delay service activation.

## **II. CUSTOMER PORTAL 2.0 SHOULD DETERMINE ELIGIBILITY WHILE LEAVING SERVICE ACTIVATION TO PROVIDERS**

CalBroadband supports the concept of having potential LifeLine customers apply through a centralized portal and establish a relationship directly with the CPUC Third Party Administrator ("TPA") before selecting a service provider. Doing so should simplify and expedite the current application process and reduce friction, particularly where customers today begin the application with their service provider but then must engage with the TPA to confirm eligibility and complete the process. Despite providers' best efforts to inform applicants about needing to engage with the TPA, provider experience indicates that the delayed introduction of an unfamiliar third party contributes to incomplete or abandoned LifeLine applications.

### **A. CalBroadband Supports 'Enrollment Through Service Providers After Receiving Enrollment ID'**

CalBroadband fully supports using Customer Portal 2.0 to streamline eligibility determinations, provided that participating service providers remain responsible for establishing accounts and activating service once a customer's eligibility has been verified. CalBroadband supports the Staff Proposal's "Enrollment Through Service Providers After Receiving Enrollment ID" process.<sup>3</sup> A similar process was used for the federal Affordable Connectivity Program

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<sup>3</sup> Ruling, Attachment A at 7.

(“ACP”), and it was effective for both customers and service providers because it offered a centralized application portal along with the ability to apply the ACP benefit to the service of the customer’s choice.<sup>4</sup> This model enables applicants to quickly obtain an eligibility determination from the TPA while leaving the logistics of account management and provision of service to the providers best equipped to handle such matters.

However, like the TPA, service providers will need time to implement the Enrollment ID process into their systems and processes. While the Staff Proposal does not specify a time period for rollout of the new Customer Portal 2.0, any further steps toward implementation should ensure adequate time for development, testing, training, and coordination among the Commission, TPA, and participating providers.

**B. CalBroadband Supports ‘Enrollment Through Provider Assistance - Before Receiving Enrollment ID’ As An Optional Pathway**

CalBroadband also supports the “Enrollment Through Provider Assistance – Before Receiving Enrollment ID” pathway described in the Staff Proposal as an optional process, especially as a supplement to the Enrollment ID process described above.<sup>5</sup> Specifically, CalBroadband supports this option as long as it preserves program integrity and does not impose new obligations on providers beyond assisting customers who request help with the LifeLine application. Maintaining this optional assistance pathway would help ensure that customers who face barriers to completing an online application are not excluded from LifeLine participation simply because they need provider support at the front end of the process. For example, this

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<sup>4</sup> See Federal Communications Commission, *Affordable Connectivity Program Consumer FAQ*, <https://www.fcc.gov/affordable-connectivity-program-consumer-faq> (describing two steps to enroll in ACP before funding for that program expired: “(1) Go to GetInternet.gov to submit an application or print out a mail-in application,” and “(2) Contact your preferred participating provider to select a service plan and have the discount applied to your bill”).

<sup>5</sup> Ruling, Attachment A at 7-8.

pathway is particularly important for customers who may not have routine internet access, have limited digital literacy, or require language assistance.

**C. CalBroadband Opposes ‘Enrollment and Provider Selection Through Customer Portal 2.0’**

CalBroadband has identified several significant operational, legal, and customer-experience issues with the Staff Proposal’s “Enrollment and Provider Selection Through Customer Portal 2.0” process,<sup>6</sup> and the Commission should not adopt that pathway. While it makes sense for the portal to educate applicants about LifeLine service providers and available plans, and to provide links and contact information for participating service providers, it is not feasible for customers to select their service provider through the portal as proposed.

First, service providers need a direct relationship with their customers for legal and practical reasons. It is not feasible for service providers to simply accept an enrollment request from a centralized portal for purposes of establishing and activating service from a person deemed eligible for Lifeline. At the outset, it is not clear how a service provider would accept a potential customer’s enrollment. Additionally, each service provider has a unique process for establishing service with customers. Service providers need to work directly with customers on tasks such as: selecting phone numbers, equipment, and installation dates; collecting and validating service addresses, billing addresses, and shipping addresses; ensuring that customers have secure and authenticated account credentials to access and manage their services; collecting billing information; accepting terms of service; providing a variety of legal and regulatory disclosures; and receiving a variety of legal consents and acknowledgements, including for important matters such as 911 access and telephone number porting.

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<sup>6</sup> Ruling, Attachment A at 5-6.

The Staff Proposal overlooks the full scope of interaction a service provider must have with a customer prior to establishing service. It would also lead to a potentially unfavorable customer experience. Under this process, LifeLine customers risk never successfully activating their service with any provider. A customer may believe that selecting a provider through the portal completes the enrollment and activation process, only to later learn that additional steps are required directly with the provider. That confusion could increase the number of abandoned applications, delay service activation, and undermine the very streamlining goals that Customer Portal 2.0 is intended to advance. Accordingly, this pathway should not be adopted.

### **III. SCOPE OF PORTAL 2.0 CHANGES TO POST-ENROLLMENT PROCESSES**

The Staff Proposal focuses primarily on the initial enrollment process and does not fully address how Customer Portal 2.0 would handle subsequent changes to a subscriber's service, if at all. For example, it seems that the proposed framework would not affect a customer's transfer of LifeLine service from one service provider to another or other customer service changes impacting their participation in the LifeLine program, including the LifeLine Home Broadband Pilot Program. CalBroadband requests that the Commission clarify how these scenarios would be handled under the Portal 2.0 model. While the proposed changes to the eligibility determination process may not alter current procedures for these types of transactions, confirmation of that understanding—or an explanation of any changes—would be helpful for providers planning their implementation.

### **IV. CONCLUSION**

The Customer Portal 2.0 described in the Staff Proposal holds the potential to streamline LifeLine program enrollment and address friction in the current process if it is implemented thoughtfully and with adequate time for participating providers to adjust their systems. CalBroadband urges the Commission to adopt an approach that uses Customer Portal 2.0 to

streamline eligibility determinations, establishes the Enrollment ID pathway as the primary enrollment model, preserves service providers' responsibility for account establishment and service activation, and clarifies how post-enrollment transactions will be handled.

Respectfully submitted,

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