

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
(Filed November 20, 2025)

**CENTER FOR ACCESSIBLE TECHNOLOGY'S COMMENT ON CUSTOMER
PORTAL 2.0 STAFF PROPOSAL**

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I. INTRODUCTION

In accordance with the instructions provided in the Administrative Law Judge’s Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal (the Customer Portal Ruling), issued on June 2, 2026, and the Email Ruling Clarifying Due Dates issued on June 10, 2026, Center for Accessible Technology (CforAT) files these timely comments. Overall, CforAT strongly supports efforts to develop a process by which customers can directly obtain a finding of eligibility for the California LifeLine program prior to interacting with any individual service provider. Indeed, both CforAT and our predecessor organization addressing the interests of customers with disabilities before the Commission, Disability Rights Advocates, have supported type of direct eligibility process since the establishment of the program’s Third Party Administrator (TPA) was first under consideration in R.04-12-001.

CforAT supports the overall intent of the Staff Proposal and the recommendation that the Commission upgrade the current LifeLine enrollment portal. However, we do recommend some modest enhancements to improve all customers’ ability to access, use, and benefit from the portal as well as some changes to language for proposed revisions to General Order 153-A.

The Commission should ensure that the user interface for the portal is consistent with current web accessibility guidelines, accessible to people with auditory, mobility, and cognitive impairments, and in-language for people who prefer to use a language other than English. The Commission should also ensure that customers who enroll in LifeLine through the customer portal, like customers who enroll directly with a provider or a street team, can obtain instant eligibility and enrollment with a provider. Finally, the Commission should revive its centralized oversight of outreach and awareness strategies and increase recruitment of appropriate partners to effectuate the goal of expanding equitable and community-based access to LifeLine.

II. DISCUSSION

As directed in the Customer Portal Ruling, CforAT provides a general discussion of the Customer Portal Staff Proposal, responds to the questions provided in the Staff Proposal, and addresses the proposed revisions to General Order 153-A. We appreciate the opportunity to provide this input.

A. Responses to the Staff Proposal

1. Overall Response

CforAT strongly supports the overall intent of the Proposed Portal 2.0 model that would allow a customer to obtain a determination of program eligibility directly, rather than using the existing process that requires a customer to select a service provider first and then have that provider initiate the enrollment process. Indeed, since the Commission first considered the creation of a TPA in R.04-12-001, consumer advocates argued in support of an eligibility process that did not rely on providers, particularly if a customer could not be certain whether the service offered by a particular provider would work effectively for them. With an independent process for obtaining an eligibility certification, a customer can first ensure their access to the program, and then select a provider. This not only gives more control to the customer, but it may also serve to reduce program churn, which is an ongoing issue of concern to providers.¹

CforAT also appreciates the overall concern displayed in the proposal on effective access to the eligibility process for customers. This includes the acknowledgement of the importance of compliance with web accessibility guidelines (discussed in greater detail below) and language

¹ Providers have repeatedly sought to enact a port freeze based on this concern, while consumer advocates note that this can leave a customer stuck with a provider whose service doesn't work in their location. But the independent enrollment option may better allow customers to obtain appropriate service separate from their eligibility determination process.

access,² as well as the recognition that a paper application process remains necessary.³ It also includes the requirement that live customer assistance be available to customers.⁴

Finally, CforAT seeks clarification about a customer’s ability to obtain assistance within their own support system in order to complete the eligibility determination process. The Staff Proposal clearly indicates that providers, including street teams working on behalf of a provider, can provide assistance.⁵ It also provides for formal customer assistance.⁶ Finally, it clearly identifies exploration of a “trusted partner integration framework” as a potential future enhancement that would support CBOs in assisting customers in the eligibility process.⁷

CforAT appreciates the inclusion of all of these options. At the same time, CforAT understands that nothing in the current proposal would prevent a customer from independently asking for help with the eligibility determination process from anyone they wish, including a family member, friend, or support organization such as a CBO. CforAT further understands the intent of the future CBO partnership framework is to ensure that CBOs can obtain compensation for work supporting customer enrollment, allowing them to dedicate resources to this service, as opposed to any restriction in allowing them to assist clients prior to the creation of the framework. We would appreciate clarification that this understanding is accurate.

Additionally, CforAT respectfully requests that the Commission prohibit anyone assisting a household applying for LifeLine from requesting or receiving any payment from the applicant for that assistance (i.e., while an organization or individual might be eligible for payment from a

² Staff Proposal at p. 4.

³ Staff Proposal at p. 5.

⁴ Staff Proposal at p. 5.

⁵ Staff Proposal at p. 7.

⁶ Staff Proposal at p. 5.

⁷ Staff Proposal at p. 16.

third party for enrolling households in LifeLine, they must do so at no cost to any individual LifeLine applicant).

2. Web Accessibility

CforAT appreciates that Portal 1.0 was designed to be compliant with web accessibility guidelines (formally known as Web Content Accessibility Guidelines, or WCAG) and that the Staff Proposal states the Commission’s intent to ensure that Portal 2.0 is also designed to be accessible.⁸ We also note that WCAG standards evolve over time, and that a statement of compliance simply with “WCAG” is not clear. At this time, appropriate compliance is best understood as compliance with WCAG 2.2 AA standards.⁹ The Web Accessibility Initiative of the World Wide Web Consortium (W3C), an organization that brings together global stakeholders to develop open standards for the web, is currently working to develop WCAG 3.0 standards.¹⁰ The Commission should ensure that the current appropriate standard is specified for Portal 2.0, and that the need for web accessibility is not simply considered at a single point in time. Rather, as the portal is developed and maintained, ongoing attention should be provided to ensure compliance with evolving standards.

3. Future Improvements

CforAT appreciates that the Staff Proposal includes a discussion of potential future portal and program enhancements. In particular, we appreciate the idea of developing a trusted partner integration framework, which we discuss in detail elsewhere, and the idea of improved outreach and awareness strategies.¹¹ In the past, there have been centralized outreach efforts under Commission oversight in the form of marketing and outreach contracts, which included outreach

⁸ Staff Proposal at p. 4.

⁹ <https://www.w3.org/TR/WCAG22/>

¹⁰ <https://www.w3.org/WAI/standards-guidelines/wcag/wcag3-intro/>

¹¹ Staff Proposal at pp. 16-17.

through CBOs.¹² The last such contract expired in 2015. The Commission should consider reviving this approach in conjunction with the overall effort to develop a trusted partnership program, so that eligible customers are less dependent on information from providers to learn about LifeLine.

B. Questions for Party Comment

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

As noted above, consumer advocates have long supported an option for customers to be able to obtain an eligibility determination prior to signing up for service from a carrier. This has been discussed repeatedly in prior proceedings overseeing the administration of the California LifeLine program.¹³ In particular, consumer advocates have been concerned that a customer may make one decision about the most appropriate service to select if they are LifeLine eligible and a different decision if they are not eligible.

Customers who have an option to directly obtain a finding of eligibility (a process that has previously been referred to as “preregistration”) are more likely to be able to engage in comparison shopping and other efforts to ensure that they are able to select a carrier that is genuinely suitable for their needs, with an understanding of whether or not they will have support from the LifeLine program. These efforts may include actions to evaluate whether they

¹² This form of outreach ceased in 2015. See ANNUAL REPORT OF THE UNIVERSAL LIFELINE TELEPHONE SERVICE TRUST ADMINISTRATIVE COMMITTEE (ULTS-AC) FOR THE PERIOD JULY 1, 2013 THROUGH JUNE 30, 2016, submitted on March 24, 2017, at pp. 2-3 and p.4. The Report is available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/lifeline/ultsac/annual-repot/ults-annual-report-fy13-16.pdf>.

¹³ See e.g. Response of the Center for Accessible Technology, The Greenlining Institute, the National Consumer Law Center, and The Utility Reform Network to the Assigned Commissioner Ruling and Scoping Memo, filed in R.11-03-013 on May 28, 2013, at pp. 46-50 (including footnotes 77, 78, and 80, which reference earlier comments filed by various combinations of consumer advocacy organizations, including The Utility Reform Network, National Consumer Law Center and Disability Rights Advocates, in R.06-05-028 and R.04-12-001).

are likely to have actual service in the locations where they spend time, including their home, place of work, or areas that they frequently travel through, and whether other people in their community receive service of adequate quality. Preregistration allows considerations to take place before a customer makes a commitment to a particular carrier.

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.

As a threshold issue, it is impossible to anticipate all of the challenges that consumers may experience with the transition, because various challenges may not become apparent until the transition begins. Accordingly, it will be important for the Commission to closely monitor the transition and promptly address any challenges which do arise.

The primary challenges that low-income consumers will face are the same access challenges they face broadly. For example, as discussed above, visually impaired consumers will need accessible websites or physical application materials in accessible formats (e.g. large print or Braille). Similarly, individuals with hearing, mobility, or cognitive impairments may face their own challenges with enrollment. The Commission should ensure that the enrollment process is accessible to a wide variety of people with disabilities, including captioning and American Sign Language interpretation for any audio information and including live customer assistance agents with specific training in assisting people with disabilities.

As discussed above, CforAT appreciates the Staff Proposal's acknowledgement that the enrollment process needs to be accessible to consumers who prefer to use a language other than English. In-language websites, printed materials, and customer service will be critical to ensure these populations are able to take advantage of the new enrollment process. CforAT

recommends that the Commission ensure that communications in any format be available, at minimum, the languages used in California’s Official Voter Information Guide.¹⁴

One population that may have their experience simplified by the creations of a preregistration process is foster youth. The Commission has worked diligently to support the provision of appropriate LifeLine service to foster youth through a series of decisions issued in R.20-02-008. With a preregistration process, it may be easier to ensure that all foster youth who are transitioning toward independence are provided with a certification of eligibility for LifeLine that allows them to maintain service.

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)?

The Staff Proposal recommends that once the TPA has verified a customer’s eligibility and the customer has selected their preferred provider through the portal, the provider should have 48 hours to determine whether to accept the applicant as a LifeLine customer.¹⁵ The Staff Proposal does not explain why this 48-hour period is necessary.

This requirement is likely to cause customer confusion—an enrollee using the portal would have to wait for 48 hours before their service could be activated, while an enrollee working with a street team would, in most cases, be enrolled and activated instantaneously.¹⁶ This could potentially exacerbate the problem of duplicative enrollment requests. For example, a customer who did not want to wait 48 hours for approval might seek out a provider’s retail location or a street team for more immediate access. This could lead to increased customer frustration and distrust of the LifeLine program and create complications for providers.

¹⁴ See <https://voterguide.sos.ca.gov/> (last accessed June 17, 2026)

¹⁵ Staff Proposal at p. 6.

¹⁶ See Staff Proposal at p. 3.

For years, LifeLine providers have demanded instantaneous confirmation of eligibility that required minimal provider effort, which the Commission has provided.¹⁷ Given that providers expect the TPA to provide instantaneous confirmation of eligibility, it is reasonable to expect that providers provide instantaneous confirmation of enrollment. When an applicant selects a provider through the portal, they should be enrolled for service with that provider. The provider may be given 48 hours to determine whether they are unable to provide service¹⁸ to that customer, and if so, they should be directed to contact the customer, explain why they are unable to provide service, and, to the extent the applicant is willing, assist the applicant with finding a different LifeLine provider. This practice will create consistent customer expectations regarding enrollment in the LifeLine program.

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.

This question is primarily directed to service providers. CforAT looks forward to reviewing their responses and may address any identified issues on reply.

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?

This question is primarily directed to service providers. CforAT looks forward to reviewing their responses and may address any identified issues on reply.

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

As noted above, CforAT understands the premise of the Trusted Partnership Staff Proposal to include a mechanism for providing compensation to the CBOs or other Trusted

¹⁷ See, e.g., D.21-09-023 at p. 11.

¹⁸ It is unclear what reasons a provider would have for being unable to provide service.

Partners that participate. Without such compensation, the intended framework would consist of efforts to persuade community-based programs and organizations to reallocate their existing resources to assist customers in enrolling in the LifeLine program. It appears that this is already permitted, but it is unlikely to become a substantial channel for program input if it depends on uncompensated work from CBOs. As noted in the description of the potential future proposal, the Trusted Partner Framework is intended to function similarly to the “street team” approach. Of course, members of street teams are compensated for the work that they do, even as the street team approach is a cause of substantial concern with the program.¹⁹

While CBO/Trusted Partner compensation is needed, the form of compensation is also likely to be an issue. CforAT recommends that any compensation model be based on staffing requirements, not on a capitation model or similar payment plan focused on a number of completed or approved applications. Capitation models encourage support for the easiest enrollments, and disadvantage organizations that work to enroll the most vulnerable customers and/or those that need the most assistance. Organizations that need to provide translation services to customers, address deficits in either functional literacy or digital literacy, or otherwise assist those who face more than average enrollment hurdles, will likely spend more staff time assisting each customer they attempt to enroll. At the same time, they are likely to be the most successful at reaching customers with greater challenges. For this reason, it would not make sense to base payment on number of enrollments.

Finally, aside from issues of compensation for CBOs, the Commission should work to develop a broad search for appropriate trusted partners to effectuate the goal of expanding

¹⁹ See Cal. Pub. Util. Comm’n, California LifeLine Program Assessment and Evaluation at p 61, filed in Order Instituting Rulemaking to Update the California Universal Telephone Service (California LifeLine Program), A.20-02-08 (May 20, 2022).

equitable and community-based access to LifeLine. This means working to identify new organizations that may be best positioned to provide assistance, including small, highly local organizations that may have the trust of a particular community. These small, highly local organizations have the necessary cultural competency (i.e., the ability to understand, communicate, and effectively interact, and build meaningful relationships with people that share their cultural, socioeconomic, and background perspectives) to build trust and assist community members with enrollment. While local churches are the typical example, small, highly local organizations can be any location that serves as an informal community center, such as local barbershops, social clubs, or neighborhood groups.

C. Comments on Proposed Revisions to GO 153-A

CforAT provides the following recommendations for revising GO 153-A to effectuate the changes contemplated in the Staff Proposal. In addition to the specific modifications discussed below, CforAT recommends that the requirement for the web portal at <http://www.californialifeline.com> be maintained in compliance with appropriate web accessibility guidelines, as discussed above, should be incorporated into the revised GO.

1. Section 4.1.1

Section 4.1.1 of the proposed revised GO addresses how LifeLine Service Providers direct customers to the revised customer portal to complete an application, including the option for the service provider to assist the customer. It also incorporates use of a paper application process for the customer.²⁰ However, it does not include any requirement for the Service Provider to inform the customer about the option for contacting call center representatives who can walk applicants through the application process and answer questions.²¹ The revised GO

²⁰ Staff Proposal at p. 12 (summarizing the proposed changes to GO 153-A for Section 4.1.1).

²¹ See Staff Proposal at p. 5.

should include a requirement to inform customers about the call center and the services it can provide.

2. Section 4.2.1

New Section 4.2.1 of the proposed revised GO authorizes customers to apply directly to the California LifeLine Program online or via a paper application that can be mailed to them.²² As with Section 4.1.1, this section should also include recognition of the option for an applicant to obtain assistance from a call center.

3. Section 4.2.2, Section 4.2.2.2.1 and Section 4.2.2.3.1

Consistent with the recommendations for Sections 4.1.1 and 4.2.1, above, Section 4.2.2, Section 4.2.2.2.1, and Section 4.2.2.3.1 should each include references to both the paper enrollment process and the availability of call center assistance for customers who have selected a service provider prior to applying for the LifeLine program.

4. Section 4.2.2.1

Section 4.2.2.1 of GO 153-A addresses the process for Lifeline Service Providers to use to validate a new customer's eligibility status. The language of this provision, which includes existing language of GO 153-A as well as proposed new language, is extremely hard to follow. For example, it includes the sentence:

The California LifeLine Service Provider shall inform the Customer that the California LifeLine Administrator will notify the Customer and the Customer's current California LifeLine Service Provider once it determines whether or not the Customer is currently or within the last 30 days has been enrolled in California LifeLine.

This sentence includes four different actors (the new Service Provider, the "current" or prior Service Provider, the customer and the Administrator), engaging in seven different actions.

²² Staff Proposal at p. 12.

CforAT recommends that this sentence be broken into parts so that each step can be more clearly understood by all of the impacted actors and they can respond appropriately.

5. Section 5.4.2

Section 5.4.2 of GO 153-A indicates that an application form must be signed by the applicant whose name appears on the form, or by their guardian or person acting pursuant to a power of attorney. Consistent with CforAT's understanding that nothing prevents an applicant from seeking assistance from a family member, friend, or other form of support, this section should include a statement that such assistance is not prohibited as long as the applicant understands what they are submitting and signs based on that understanding.

III. CONCLUSION

Subject to the modest revisions discussed above, CforAT supports the recommendations of the Staff Proposal.

Respectfully submitted,
June 17, 2026

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