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

Order Instituting Rulemaking to Update the California LifeLine Program	Rulemaking 25-11-005

REPLY COMMENTS OF CTIA ON THE PROPOSED DECISION OF PRESIDENT JOHN REYNOLDS

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Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, CTIA respectfully submits this reply to the initial comments on the Proposed Decision of President John Reynolds addressing permanent LifeLine emergency disaster measures and integration with the federal Lifeline program, served July 31, 2026 ("PD").

I. THE INITIAL COMMENTS CONFIRM THAT THE PROPOSED DELEGATIONS TO STAFF WOULD BE LEGAL ERROR.

A broad range of commenters point out that the delegations of authority to Staff in the PD would constitute legal error. Commenters accurately describe how the broad grant of authority to the Executive Director to waive or suspend provisions of G.O. 153-A would allow Staff to make non-ministerial policy and final discretionary decisions, which the Commission may not lawfully delegate.[1] Parties show that proposed new paragraph 15.3 would place no clear boundaries around the Executive Director's authority to waive or suspend the Commission's General Order and provide no meaningful opportunity for timely Commission review of Staff action, as required by law.[2] Parties also observe that adoption of new paragraph 15.3 would be unlawful because the Commission never provided notice that it was considering delegating authority to Staff to modify G.O. 153-A in this manner.[3] Accordingly, the PD should be revised to delete paragraph 15.3.

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[1] *See, e.g.*, AT&T Comments at 1-3; National Lifeline Ass'n ("NaLA") Comments at 8-9; The Utility Reform Network and Center for Accessible Technology ("TURN/CforAT") Comments at 8-10; CTIA Comments at 1-6. Unless otherwise specifically noted, references herein to a party's "Comments" refer to that party's initial comments on the PD filed in this docket on August 20, 2026.

[2] *See, e.g.*, TURN/CforAT Comments at 9 (language in paragraph 15.3 "is vague, and its potential application is unclear"). TURN/CforAT specifically criticizes the waste, fraud, and abuse trigger in paragraph 15.3, but the same flaws apply to all aspects of the provision. *See also, e.g.*, AT&T Comments at 1-3; NaLA Comments at 8-9; CTIA Comments at 1-6; *cf.* Public Advocates Office ("PAO") Comments at 9 (recognizing that valid delegations of authority to Staff must include specific direction as to how such authority may be exercised, such as "criteria" upon which action is to be based and a "process for party input").

[3] *See* NaLA Comments at 6-8; TURN/CforAT Comments at 9.

II. THE RECORD SHOWS THAT THE PD ERRS IN FAILING TO FACILITATE INTEGRATION IN FEASIBLE WAYS.

CTIA's initial comments discussed how the PD contains technically and legally erroneous material that would undercut the important goal of minimizing the impacts of the bifurcation of the eligibility and enrollment processes for California LifeLine and federal Lifeline.[4] Other comments bear this out. In particular, commenters take issue with the confusing and unnecessary requirements that the PD would impose on providers attempting to enroll customers in both programs. As parties observe, while the proposal to require California LifeLine providers to "take appropriate steps to enroll" customers in federal Lifeline if the customer expresses an interest in doing so may appear constructive on its face, the lack of clarity regarding what constitutes "appropriate steps" would make the requirement legally unsound,[5] particularly given the very limited circumstances in which a provider actually can "enroll" a customer in federal Lifeline.[6] In addition, commenters agree that the PD fails to justify declining to make up federal support that low-income Californians lose as a result of the split between the two programs.[7]

III. COMMENTERS CONFIRM THAT IT WOULD BE LEGAL ERROR FOR THE COMMISSION TO ADOPT NEW REQUIREMENTS WITHOUT CONSIDERING THEIR FEASIBILITY OR BURDEN.

Commenters raise concerns that the PD proposes significant new requirements to collect, report, and serve enrollment-related data without any assessment of whether they are feasible or economically justifiable.[8] The purposes of LifeLine are not served by burdening providers with an obligation to serve data on the service list that is publicly available or competitively sensitive.

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[4] *See* CTIA Comments at 9-11.

[5] *See, e.g.*, AT&T Comments at 5-7.

[6] *See* CTIA Comments at 10-11.

[7] *See, e.g.*, NaLA Comments at 2-4; TURN/CforAT Comments at 1-2; CTIA Comments at 7.

[8] *See, e.g.*, California Broadband & Video Association ("CalBroadband") Comments at 2-6; Verizon Comments at 4-5; NaLA Comments at 4-5.

First, much of the data that the PD directs providers to compile and serve is available from other sources.[9] Specifically, the TPA already possesses the data on the number of each provider's subscribers enrolled only in California LifeLine and the subset total of those customers that the TPA has qualified for California-Only federal support make-up, and it can readily obtain the number of federal Lifeline subscribers reported by USAC.[10] Stakeholders can already access this information or, if the Commission wishes, it could distribute it to interested parties itself, or direct the TPA to do so.

Commenters did not raise objections to reporting other data to the Commission, such as data on the number of subscribers enrolled in both California and federal Lifeline and federal Lifeline only[11]—to the extent providers have or are able to collect such data, as discussed below. There is no basis, however, to burden LifeLine providers with an obligation to serve this data on other parties. If the Commission wishes to publish this data (or direct the TPA to publish it), it may do so, but should do so in aggregate form due to competitive sensitivity.[12]

In addition, there is no record basis to confirm that providers necessarily possess or collect all of the required data or, even if so, that they have retained it for prior periods, including numbers of customers that subscribe to California LifeLine only, federal Lifeline only, or that were qualified for make-up support.[13] The revised General Order should make clear that providers' obligations to report data are limited to the extent such data are available.

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[9] *See, e.g.*, Cal Broadband Comments at 6; Verizon Comments at 4-5.

[10] *See, e.g.*, CalBroadband Comments at 4; NaLA Comments at 4-5; *see also* Universal Service Administrative Co., Open Data, Lifeline Disbursements Tool, https://opendata.usac.org/Lifeline/Lifeline-Disbursements-Tool/rink-mije.

[11] *See, e.g.*, Verizon Comments at 4-5.

[12] *See, e.g.*, *id.*; NaLA Comments at 5; CalBroadband Comments at 5.

[13] *See, e.g.*, CTIA Comments at 8; CalBroadband Comments at 3-4.

IV. THE PD CORRECTLY CONCLUDES THERE IS NO RECORD TO SUPPORT REQUIRING PROVIDERS TO STAFF RELIEF CENTERS.

The Neighborhood Legal Services of Los Angeles County ("NLSLA") suggests that the Commission should require communications providers to allocate personnel to staff disaster assistance centers.[14] NYLSA asserts, without support, that "the burden on providers … would be minimal."[15] As the PD correctly notes, however, the Commission "do[es] not have the record to support the reasonableness" of such a requirement.[16] As such, the PD should not be modified on this issue.

V. CONCLUSION

The initial comments confirm that the Commission should modify the PD and the General Order as delineated in Appendices A-D of CTIA's initial comments.

Respectfully submitted August 25, 2026, at San Francisco, California.

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[14] NLSLA Comments at 5.

[15] *Id.*

[16] PD at 19.