

FILED
10/12/26
04:59 PM
C2610028

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Bin Liu

Complainant,

vs.

Lycamobile USA Inc.

Defendant.

Case (C.) _____

Complaint

COMPLAINANT	DEFENDANT (Include Utility "U-Number," if known)
Bin Liu 3317 San Gabriel Blvd Rosemead, CA 91770 (626) 727-3356 hzbrianliu@gmail.com	Lycamobile USA Inc. 24 Commerce Street, Suite 100 Newark, NJ 07102 (973) 820-4361 Roberta.Kraus@Lycamobile.com

(Internal Use Only)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMPLAINT

Additional complainant(s) (Provide name, address, phone number and email address for each complainant)

Name of Complainant	
Address	
Daytime Phone Number	
Email Address	

☒ One/sole complainant is representative listed in Box C-1

☐ Additional complainants listed in attachment

Additional Defendant(s) (Provide name, address, phone number and email address for each defendant)

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?
☒ YES ☐ NO

Has staff responded to your complaint?
☒ YES ☐ NO

Did you appeal to the Consumer Affairs Manager?
☒ YES ☐ NO

Do you have money on deposit with the Commission?
☐ YES ☒ NO
Amount $_____

Is your service now disconnected?
☒ YES ☐ NO

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

Before the September 8, 2025 port-out, (626) 223-2396 was my Lyca Mobile telephone number. According to Lyca Mobile's own records, my telephone number was ported out of Lyca Mobile on September 8, 2025. I did not request the port-out, consent to the transfer, or authorize anyone to act on my behalf in connection with the port-out. After the port-out, I could no longer use my telephone number.

In its October 21, 2025 written response, Lyca Mobile stated that it had escalated the issue to its back-end teams "to explain when and how your account number and PIN were triggered." In the subsequent informal complaint process, I was not provided with the specific result of that back-end escalation.

CAB denied my appeal on August 31, 2026, and I am therefore filing this Formal Complaint.

Scoping Memo Information (Rule 4.2[a])

(1) The proposed category for the Complaint is (check one):
☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
☐ ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint (Rule 4.6)

(4) The issues to be considered are
(Example: The utility should refund the overbilled amount of $78.00):

(1) Whether the September 8, 2025 port-out was validly authorized.

(2) Whether Lyca Mobile's processing of the September 8, 2025 port-out complied with applicable requirements.

(5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.
Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09): 11/16/2026
Hearing (Example: 7/1/09): 12/11/2026

Explain here if you propose a schedule different from the above guidelines.

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

I request that the Commission order Lyca Mobile to take all necessary, lawful, and secure measures to restore my original telephone number to me within a reasonable period of time after the effective date of the Commission's order.

OPTIONAL (OPT OUT OF ELECTRONIC SERVICE): I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by mail (paper only). My/our mailing address(es) is/are:

Dated Rosemead (City), California, this 12th (date) day of October (month), 2026 (year)

Bin Liu

Signature of each complainant

REPRESENTATIVE'S INFORMATION:
Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: _____

Address: _____

Telephone Number: _____

E-mail: _____

Signature: _____

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/12/2026 (date), at Rosemead (City), California

Bin Liu

(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____ (date), at _____ (City), California

_____ Signature of Officer

_____ Title

NUMBER OF COPIES NEEDED FOR FILING:
If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one (1) defendant, then you must submit a total of eight (8) copies.

If you are filing your formal complaint electronically (visit http://www.cpuc.ca.gov/PUC/efiling for additional details), then you are not required to mail paper copies.

Mail paper copies to:
California Public Utilities Commission
Attn: Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

Bin Liu

Signature

10/12/2026

Date

Bin Liu

Print your name