PUBLIC VERSION

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of American Broadband and Telecommunications Company LLC (U-4457-C) for Appeal Request for Expedited Schedule	A.26-06-003 (Filed May 15, 2026)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE MOTION FOR PRELIMINARY INJUNCTION

(PUBLIC VERSION)

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American Broadband and Telecommunications Company LLC (AMBT or the Company) respectfully submits this Response to a directive by Assigned Commissioner President John Reynolds to submit additional information related to AMBT's Motion for Preliminary Injunction.[1] The Scoping Memo and Ruling requests the parties "to submit a list of disputed and undisputed facts relevant to the Motion." The parties are also asked to respond to a series of questions.

I. STATEMENT REGARDING DISPUTED AND UNDISPUTED FACTS

The Ruling directs the parties to submit "a list of disputed and undisputed facts relevant to the Motion." AMBT filed its Motion for Preliminary Injunction (Motion) on May 15, 2026, and an amended public version of the Motion on July 17, 2026. As required by Rule 11.1(d) of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, the motion included "the facts and law supporting the motion and the specific relief or ruling requested." Rule 11.1(e) of the Commission Rules of Practice and Procedure provides that "[r]esponses to written motions must be filed and served within 15 days of the date that the motion was served." On August 12, 2026, the Consumer Protection and Enforcement Division

[1] *See* Assigned Commissioner's Scoping Memo and Ruling (Scoping Memo and Ruling), November 5, 2026.

(CPED) filed an opposition to AMBT's Motion for Preliminary Injunction (Opposition).[2] This was the CPED's opportunity to respond to the facts and law supporting AMBT's motion.

In the Opposition, the CPED did not take issue with the facts detailed in AMBT's Motion. Indeed, the only potential disputed factual issue mentioned by the CPED is whether Unity Wireless, Volt Mobile, and SurgePays performed actions that would transform them into and displace AMBT from its role as the provider of LifeLine service to AMBT's California LifeLine subscribers. Specifically, the CPED states in its Opposition that "CD's enforcement actions were based on its determination that Unity Wireless, Volt Mobile, and SurgePays acted as unauthorized LifeLine service providers, including by performing functions CD identified as enrollment, customer service, distribution of devices, and service activation."[3] While AMBT acknowledges that the CD asserted its actions were based on the foregoing determination, AMBT disputes that the listed functions are "core functions" or that they were not performed by AMBT.[4] The CPED provided no response to any of AMBT's factual statements in its Motion that certain functions were not "core functions" or that AMBT's vendors were performing those functions. As such, AMBT submits that the CPED does not dispute those facts in its Opposition.

AMBT notes that the CPED lists certain activities that AMBT's vendors performed under contract with AMBT (*i.e.*, promoted LifeLine service, provided consumers access to AMBT applications, transmitted completed applications through AMBT's enrollment platform, distributed handsets to qualifying subscribers, and operated Level 1 customer service call centers

[2] Due to procedural issues with the Docket Office, AMBT resubmitted and re-served its amended Motion for Preliminary Injunction on July 28, 2026. The Docket Office assigned July 17, 2026 as the filing date.

[3] CPED Opposition, at 3.

[4] *See* Motion, at 24-28.

for AMBT).[5] AMBT does not dispute that its vendors performed those activities in support of AMBT's provision of LifeLine service. Rather, AMBT disputes that its vendors' activities transformed them into unauthorized LifeLine service providers and displaced AMBT from its role as the LifeLine service provider under the Commission's rules.

To resolve AMBT's Motion, the Commission must determine if the Company meets the legal standard for preliminary injunctive relief. AMBT relies on its factual statements and legal arguments presented in its Motion and its Reply in Support of Its Motion for Preliminary Injunction. As explained above, the CPED failed to dispute AMBT's factual statements in its Opposition. As such, the legal issues regarding AMBT's Motion can be resolved based on the following undisputed facts.

#	Fact
	Background
	American Broadband and Telecommunications Company LLC (AMBT or Company) is organized under the laws of the State of Delaware.
	AMBT's principal place of business is located at 1480 Ford Street, Maumee, Ohio 43537.
	Jeffrey Ansted is the President of AMBT.
	AMBT has provided wireless telecommunications services to consumers since 2004.
	AMBT operates as a Mobile Virtual Network Operator by purchasing network access from Mobile Virtual Network Aggregators (MVNAs) and Mobile Virtual Network Enablers (MVNEs).
	The California Public Utilities Commission (Commission) designated AMBT as a federal Lifeline eligible telecommunications carrier (ETC) and California LifeLine provider on September 14, 2017 in Resolution T-17516.
	AMBT provides its California LifeLine subscribers with service under Commission-approved plans and terms.

[5] *See* CPED Opposition, at 3-4.

#	Fact
	Cease and Desist Notice and Response
	On November 4, 2025, the Communications Division (CD) issued a Cease and Desist Notice suspending AMBT's Service Provider Intake Application Programming Interface (SPIA) credentials and withholding LifeLine payments until the CD determined that AMBT was in compliance.
	The Cease and Desist Notice alleged that AMBT had "violated the California LifeLine program rules by improperly sharing its California LifeLine and Eligible Telecommunications Carrier authority with non-approved service providers."
	The Cease and Desist Notice directed AMBT to "cease and desist from allowing any non-approved service providers to offer California LifeLine services using its authority," to take corrective actions, and to respond to data requests.
	The Cease and Desist Notice directed AMBT to "[t]erminate all partnerships and cease reselling and distributing LifeLine services through non-approved service providers." The CD named the following companies as "non-approved service providers": SurgePays, Unity Wireless, Volt Wireless, and Your Call Wireless.
	The Cease and Desist Notice required AMBT to file a Tier 2 Advice Letter with two items: (1) a signed declaration confirming that all unauthorized partnerships were terminated and that all unauthorized terms and conditions were removed from the partners' websites and (2) a draft customer notification, for CD approval, telling customers "improperly enrolled through non-approved service providers" that they could transfer to another authorized provider at no cost and without service interruption, or de-enroll.
	On November 7, 2025, AMBT responded to the Cease and Desist Notice. The response included the Company's answers to data requests.
	AMBT has not authorized any company to resell its LifeLine services or to operate as a LifeLine service provider.
	Your Call Wireless is an AMBT brand, approved through Advice Letter No. 18 (filed February 18, 2020; accepted March 4, 2020).
	SurgePays, Unity Wireless, and Volt Mobile are AMBT's marketing and distribution partners.
	SurgePays, Unity Wireless, and Volt Mobile do not hold California LifeLine authorizations or ETC designations.
	SurgePays marketed only under AMBT's American Assistance brand in California and did not use its USA Phone brand in California. SurgePays only marketed CPUC-approved American Assistance LifeLine service plans.

#	Fact
	Volt Mobile and Unity Wireless marketed AMBT's LifeLine service by disclosing to customers that the LifeLine service was "powered by" AMBT and subject to AMBT's terms and conditions. Volt Mobile and Unity Wireless only marketed CPUC-approved American Assistance LifeLine service plans.
	Prior to November 2025, Volt Mobile ceased marketing AMBT's LifeLine services using the "powered by" model in California.
	On November 6, 2025, Unity Wireless ceased marketing AMBT's LifeLine services using the "powered by" model in California.
	AMBT provided information about its marketing partnership with Unity Wireless in an email dated January 27, 2025, addressed to lifeline@cpuc.ca.gov. The CD stated in the Cease and Desist Notice that the marketing information should have been sent to CaLLMarketing@cpuc.ca.gov.
	AMBT did not realize that the email did not reach the correct mailbox until receiving the Cease and Desist Notice.
	AMBT's failure to submit Unity Wireless and Volt Mobile marketing materials to the correct address was an unintentional oversight.
	The CD has not alleged that any marketing materials used by AMBT's marketing partners were inaccurate or misleading.
	On February 26, 2026, AMBT filed Advice Letter No. 39 to address items in the Cease and Desist Notice.
	Advice Letter No. 39 included a declaration confirming that AMBT has amended the terms of its agreements with SurgePays, Unity Wireless, and Volt Mobile to terminate the "powered by AMBT" marketing arrangements that Commission Staff considers to be unauthorized. The addendums to the agreements provide that the marketing partners may market only with approved American Assistance materials and may not hold themselves out as wireless or LifeLine providers.
	Advice Letter No. 39 included a declaration confirming that AMBT's Commission Staff-approved terms and conditions for LifeLine service have been removed from those companies' websites.
	Advice Letter No. 39 included two alternative versions of a draft customer notice. The two alternative versions were included in the Advice Letter at the direction of the CD per an email dated February 20, 2026.
	On March 20, 2026, the CD advised AMBT that it was suspending Advice Letter No. 39 for an additional four months through July 27, 2026.
	On July 29, 2026, the CD rejected Advice Letter No. 39 under General Order 96-B, General Rules, Rule 5.3.

#	Fact
	Recoupment Letter
	On March 3, 2026, CD issued a Recoupment Letter. The CD approved AMBT's claims for September through December 2025, but denied claims for customers it said were served by Unity Wireless, Volt Mobile, and SurgePays. The CD stated that subsidies paid for August 2024 through August 2025 for those customers are subject to recoupment.
	The CD calculated the recoupment amount as $1,708,682.87: $2,505,196.02 in previously approved claims for alleged "unauthorized providers" minus $796,513.15 in previously approved claims for September 2025 through December 2025.
	The CD asserted in the Recoupment Letter that Unity Wireless, Volt Mobile, and SurgePays are not authorized California LifeLine service providers or ETCs and that their marketing materials were never submitted to or approved by the CD.
	The CD asserted in the Recoupment Letter that the entities performed "core LifeLine service provider functions" and that AMBT "transferred most of the LifeLine subsidies" to them.
	The CD asserted in the Recoupment Letter that the "core Lifeline service functions" are "enrollment, customer service, distribution of devices, and service activation."
	AMBT's LifeLine Service Operations
	AMBT provides LifeLine service to all subscribers it has claimed for LifeLine reimbursement. AMBT provides all of the required service elements for a LifeLline Service Provider under General Order 153-A, Appendix A-2.
	All LifeLine applications for subscribers claimed by AMBT were AMBT applications using AMBT's disclosures and consents with no mention of any third party.
	AMBT contracts for and pays for wholesale access to mobile networks so that it can provide voice and data services to its LifeLine customers. AMBT purchases wholesale network access from Prepaid Wireless Wholesale (T-Mobile), Unity Wireless (T-Mobile), and SurgePays (AT&T). AMBT's arrangements with these entities enable the Company to offer its subscribers the ability to place and receive calls.
	AMBT provides the following LifeLine service elements: unlimited access to and disclosures related to 911 emergency services, LifeLine minimum service standards, billing, contracts, the purchase of additional broadband, California Relay Service, 900/976 blocking, operator service/directory assistance/411, unlimited free customer service/611, and public safety N11s.
	AMBT manages its enrollment platform with assistance from CGM (a software solutions vendor widely used by LifeLine service providers). All California LifeLine applications flow through AMBT's enrollment platform.

#	Fact
	AMBT's marketing partners' enrollment role is limited to promoting AMBT's service and submitting AMBT's applications through AMBT's enrollment platform.
	AMBT utilizes CGM to interface with the SPIA system to facilitate all new subscriber enrollments in the California LifeLine program and process all provider-to-provider subscriber transfers.
	As attested to by CGM in a declaration, CGM is the only entity with access to AMBT's SPIA credentials. AMBT's marketing and distribution partners do not have a direct link to or any access to AMBT's SPIA credentials.
	AMBT initiates the network connection after a customer is determined by the California LifeLine Third Party Administrator (TPA) to be eligible for LifeLine and is enrolled. AMBT controls the initial connection to the network, activates the SIM card associated with the subscriber, and controls disconnections from the network for non-usage or account cancellation.
	AMBT's marketing partners have no responsibility for nor ability to perform service activation.
	AMBT's LifeLine subscribers are associated with its Operating Company Number (OCN).
	AMBT purchases a SIM card for each subscriber that is used to activate and manage the service.
	AMBT monitors all Customer Detail Records (CDRs) for usage and any non-usage disconnects required under the California LifeLine rules.
	AMBT monitors the Daily Return Files from the TPA to ensure the TPA is updated on every account status via SPIA.
	AMBT processes, files, and certifies all federal and California LifeLine claims. For California, AMBT submits the Weighted Average Report (WAR) file and connections file to the TPA using AMBT's credentials to access the TPA's electronic claim and application portal (eCap).
	AMBT's marketing partners distribute free handsets when a subscriber is eligible. Distribution of handsets is not a provision of LifeLine service.
	AMBT provides free, unlimited access to customer service, including for information about LifeLine, service activation, service termination, service repair, and bill inquiries, and in the same language in which the service was originally marketed.
	AMBT designates its call centers as "Level 1" or "Level 2" call centers. [redacted] Level 1 call center used a "powered by" AMBT disclosure to inform the subscriber that AMBT is the service provider for the branded service.

#	Fact
	Level 1 call centers are outsourced to third parties, including to MVNEs, such as [redacted], and to a company operating a call center in India.
	The Level 2 call center is staffed by AMBT employees.
	Level 1 call center representatives provide information only and can respond only to questions about customer data usage and amounts of data remaining on California LifeLine plans, the date that a customer's monthly plan resets thereby making the monthly data allotment, how a customer can purchase additional data, and technical support related to a SIM card or device.
	Level 2 call center representatives are AMBT employees who can make changes to account contact information, including changes to physical and email addresses, answer questions about annual recertification, continued eligibility, terminating service or de-enrollment, and handle any customer complaints that a Level 1 call center was unable to resolve.
	AMBT passes through LifeLine subsidies to LifeLine subscribers as discounts.
	AMBT's payments to vendors come from AMBT's revenues.
	Irreparable Harm
	AMBT has not received $8,795,448 in LifeLine reimbursements for service provided in September 2025 through September 2026.
	California LifeLine subscribers are a significant part of AMBT's business, representing [redacted] of its subscriber base.
	California subscribers cost more to serve because of higher California minimum service requirements, so network invoices for them are significantly higher.
	AMBT has been unable to pay its vendors in full for network access, marketing and distribution, software, and administrative services.
	AMBT is over 30 days late on various invoices and has received notices permitting MVNA/Es to terminate accounts and connectivity within 14 days.
	MVNA/Es have threatened to shut down AMBT's access to AT&T and T-Mobile networks.
	AMBT's loss of access to AT&T and T-Mobile networks would immediately end LifeLine service and cause loss of phone numbers for up to 19,000 subscribers.
	MVNA/Es have terminated AMBT's ability to offer subscribers additional data purchases.
	[redacted] when AMBT lost the ability to offer additional data for purchase.

#	Fact
	[redacted]
	AMBT has lost goodwill with vendors and [redacted].
	The CD's suspension of AMBT's SPIA access also has severely compromised AMBT's ability to enroll new customers in California LifeLine.
	Without SPIA access, AMBT must use the manual "pink envelope" process. The "pink envelope" process requires a LifeLine customer to receive and complete a LifeLine application from a LifeLine service provider, such as AMBT, and then the provider must request the TPA to send another application, which is usually in a pink envelope, to the LifeLine customer via U.S. mail.
	The overall approval rate for SPIA enrollments is 98%, while the "pink envelope" process has an approval rate of approximately 10%.
	The SPIA enrollment process happens in real time (*i.e.*, within minutes), while the manual "pink envelope" enrollment process can take approximately 20 days.
	The SPIA enrollment process allows AMBT to immediately provide approved subscribers with a SIM card or phone. The manual "pink envelope" process requires AMBT to mail a SIM card to the subscribers or arrange a meeting to have them physically pick up the SIM card or phone.
	The manual process includes delays and additional costs that place AMBT at a competitive disadvantage.
	AMBT cannot sustain providing LifeLine service without reimbursement until a decision is issued.

As noted above, the CPED's Opposition does not dispute the factual statements in AMBT's Motion. Therefore, there are no disputed facts relevant to AMBT's Motion.

II. RESPONSES TO QUESTIONS

AMBT provides its responses to the following questions posed in the Scoping Memo and Ruling.

1. Which SPIA functions are available to AMBT and which remain unavailable?

The following table identifies SPIA functions that are available and those that remain unavailable.

SPIA function	**Status for AMBT**	**Effect**
Submit new applications	**UNAVAILABLE**	AMBT cannot enroll a new California LifeLine subscriber in near-real time. This is the whole of the operative restriction, and the whole of the harm the Motion addresses.
Transfer requests (benefit portability)	**UNAVAILABLE for Inbound Benefit Transfers** Available for Outbound Benefit Transfers	AMBT is unable to process inbound benefit transfers. AMBT processes outbound benefit transfers in the ordinary course.
Update applicant and subscriber information	Available	AMBT maintains accurate subscriber records with the Third Party Administrator (TPA).
De-enroll customers	Available	AMBT performs disconnections and de-enrollments in the ordinary course, including removal of departed subscribers under G.O. 153-A, Section 9.8.8 and non-usage de-enrollment under Section 5.7.

AMBT continues to remain in full control of the customer lifecycle and to comply with the Commission's LifeLine requirements. For example, AMBT continues to comply with rules regarding de-enrollment for non-usage, participate in the TPA's anti-fraud processes, and report subscriber activity by the next business day.[6] Although certain SPIA functions remain intact, AMBT is unable to use SPIA to add new subscribers or to accept inbound benefit transfers. In a prepaid service model, subscribers churn continuously, and a customer base that cannot replace churn declines month over month without interruption. Moreover, subscribers lost to churn

[6] *See* General Order 153-A, Sections 5.7, 6.3.1–6.3.2, and 7.11.2–7.11.3.

during the SPIA suspension are highly unlikely to return when the SPIA suspension lifts. Those customers will have enrolled with a competitor. AMBT's field relationships, agent network, reputation, and goodwill that helped produce AMBT's California LifeLine subscriber enrollments do not survive after a prolonged period of not being able to enroll new subscribers. As explained in the Motion, AMBT's inability to use SPIA to submit applications for California LifeLine has caused irreparable harm to AMBT.[7]

2. Is the file process enrollment through the third-party administrator available to AMBT while its SPIA access is suspended? If so, has AMBT submitted enrollments through the file process? If not, why has AMBT not used the file process?

The file process, also known as the "pink envelope" process, is available to AMBT. However, as detailed in the Motion, the file process is not a viable alternative for AMBT due to the low approval rate (approximately 10%) compared to the approval rate for SPIA enrollments (98%), as well as the costs and delays associated with the process.[8] In addition to being an infeasible and inefficient option from a business perspective, the Commission's manual enrollment process is fraught with compliance risks. Accordingly, AMBT has not used the file process.

AMBT primarily relies on in-person, face-to-face interaction with prospective LifeLine customers. When AMBT has SPIA access to support LifeLine enrollments, the entire application and enrollment process occurs while the applicant is present. Specifically, the application is submitted via the SPIA to the TPA, the TPA returns an eligibility determination in near-real time, and an approved applicant is enrolled in LifeLine and leaves the in-person interaction with a handset (or a SIM to use with their own handset) and a working telephone

[7] *See* Motion, at 32-39.

[8] *See* Motion, at 36-38.

number. AMBT's operational measurement of the SPIA approval process (from the time the application is submitted to the TPA until an approved applicant's LifeLine service is activated) is approximately two to five minutes.

In contrast, the file process cannot be completed in the applicant's presence and requires substantially more time to complete. The following steps detail the timeline for completion of an applicant's enrollment under a best case scenario where the applicant supplies complete information at the point of contact, receives a pink envelope from the TPA that contains the application, and mails the completed application and all required documentation on the day of receipt.

	Step	**Actor**	**Elapsed**	**Basis**
1	AMBT submits the enrollment request to TPA through the file process	AMBT	Day 0	AMBT operations
2	TPA generates and mails the paper application packet to the applicant	TPA	2-5 days	TPA practice
3	First-class mail transit to the applicant	USPS	~3–7 days	USPS
4	Applicant completes the form and assembles proof of eligibility documents	Applicant	Same day (best case)	Stated assumption
5	First-class mail transit back to the TPA	USPS	~3–7 days	USPS
6	TPA reviews the submitted document and makes a decision	TPA	3 business days from receipt	CPUC timeline
7	TPA sends the application decision notice to the applicant and to AMBT	TPA	~3–7 days	CPUC timeline
8	AMBT provisions service and delivers a handset or SIM to the approved applicant	AMBT	After notice	AMBT operations

Under the foregoing best case scenario with an immediately cooperative applicant, the enrollment process takes two to four weeks from the time of an applicant's initial contact with

AMBT until the applicant is approved and has an activated LifeLine service. This is significantly longer than the two to five minutes it takes when the SPIA approval process is used.

While the foregoing scenario results in a two- to four-week delay between an applicant's request to enroll in LifeLine and the service activation date, the Commission's published timeline for the California LifeLine application process is considerably longer, as described in the following table.[9]

Day	**Event in the Commission's Application Process Timeline**
3	Reminder by SMS text (wireless) and prerecorded outbound call
21	Postcard reminder mailed, plus SMS text and prerecorded call reminders
36	Last day the applicant may request a reprint of the initial application form
44	Last day the Administrator accepts the initial application form — close of the 44-day initial application window
45–48	Grace period: a mailed application received on these days is treated as submitted by the Day 44 due date
47	Last day the Administrator may issue a soft or correctible denial
64	Last day the applicant may request a reprint after a soft or correctible denial
72	Last day the Administrator accepts an application issued on a soft or correctible denial
82	Last day the Administrator may begin the Identity Authentication process
97	Last day the Administrator accepts an Identity Authentication form and identity documentation
100	Last day the Administrator may review a submitted document
111	Last day the Administrator may send an application decision notice to the applicant and the applicant's service provider

[9] *See* California LifeLine – New Enrollment Application Process Timeline, available at https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/lifeline/lifeline-related-forms-and-notices-for-service-providers. As noted on the timeline, the TPA has three business days from receipt of a document to review it and make a decision about whether an applicant is eligible for LifeLine. However, the TPA may accept and review a submitted document at any point up to Day 100 after an applicant initiates a request to enroll in LifeLine.

Under the Commission's New Enrollment Application Timeline, over three months can pass between an applicant's request to enroll in LifeLine and the TPA sending its decision about whether to approve the applicant. The practical consequence of an extended file process is not merely delay – it effectively results in an inability to acquire LifeLine subscribers. A LifeLine service provider that advises a prospective subscriber that an application packet will arrive by mail in a week, that documents must be assembled and mailed back, and that a telephone may follow several weeks later, cannot fairly compete with another LifeLine service provider with SPIA access that can offer enrollment in LifeLine and a working telephone within minutes. For this reason, the manual process does not simply slow down AMBT's acquisition of subscribers, it forecloses it.

The file process also prevents AMBT from using verification controls that are embedded in its SPIA-integrated enrollment platform and exposes the application process to compliance risks. Such compliance risks include the use of purchased or compiled customer leads to generate applications. When AMBT has SPIA access, AMBT's in-person enrollment process incorporates the following steps at the time the LifeLine application is completed:

- A latitude and longitude check that geolocates the application at the point of enrollment, which identifies and blocks applications originating outside California or outside the United States.

- A time stamp on each application, which checks for submissions at hours inconsistent with genuine field enrollment.

- A customer photograph captured at the time of application. This control directly defeats list-driven enrollment because it establishes that a living applicant was physically present with the enrollment representative rather than an identity drawn from a compiled list.

- Use of AMBT's Proof Verification Template (PVT). This template holds the customer ID and contains a picture of the AMBT application taken by the enrollment agent to prove the customer was present at the time of the application.

The foregoing controls are effective at preventing fraudulent or otherwise improper LifeLine enrollments, especially when used for in-person transactions facilitated by an enrollment representative. These controls cannot be used with the file process. When the manual process is used, a paper application arrives at the TPA with no verified point of origin, no reliable submission time, and no evidence that the named applicant was ever present when it was completed. As a result, the manual process provides an opportunity for bad actors, including those that work from lists of customer leads, to complete applications for ineligible consumers or for consumers who are not interested in applying for LifeLine service.

As a result of the suspension of its SPIA access, AMBT has lost the ability to use compliance controls that are an integral part of its enrollment platform. If AMBT used the file process, it would reduce the integrity of the enrollment process by moving it to a channel that prevents AMBT from applying its various controls to verify compliance. For this reason, as well as due to the costs and delays that make the process infeasible, AMBT has not used the file process.

3. What are the reimbursement claim amounts submitted by AMBT since December 2025, by month? Provide a breakdown of subscribers claimed for each named partner including AMBT, SurgePays, Unity, Volt, and YourCall.

The following table identifies the amount of LifeLine reimbursement claims submitted by AMBT since September 2025. AMBT also includes the amount of LifeLine claims for September 2025 through November 2025 because it has not received LifeLine payments for services it provided to its LifeLine subscribers since September 2025. The amount of reimbursement claims at issue in this matter will continue to increase each month that AMBT's LifeLine claims remain unpaid.

Month	**California LifeLine Claims**
September 2025	[redacted]
October 2025	
November 2025	
December 2025	
January 2026	
February 2026	
March 2026	
April 2026	
May 2026	
June 2026	
July 2026	
August 2026	
September 2026	
Total	**$8,795,448**

The question also asks for a "breakdown of subscribers claimed for each named partner." AMBT did not claim any subscribers for any "named partner." As detailed in the Motion, AMBT, not any of its marketing partners, is the LifeLine service provider for all of the subscribers claimed. AMBT provided 100 percent of the LifeLine service elements under General Order 153-A, Appendix A-2, manages 100 percent of the customer lifecycle, and processed 100 percent of the enrollments via its enrollment platform. The marketing partners solely acted as enrollment representatives, consistent with the definition in 47 C.F.R. § 54.400(p).[10]

The following table identifies the number of AMBT LifeLine subscribers claimed each month by AMBT for LifeLine services provided by AMBT from December 2025 to September 2026. As noted above, AMBT is the LifeLine service provider for all subscribers it has claimed. Listing the number of subscribers under a particular company indicates only that the subscribers

[10] *See* Motion, at 19-29.

were enrolled as a result of the company's marketing efforts, not that the subscribers were the company's subscribers.

Month	AMBT American Assistance	AMBT Your Call Wireless	SurgePays	Unity Wireless	Volt Mobile	Total
December 2025						
January 2026						
February 2026						
March 2026						
April 2026						
May 2026						5
June 2026						
July 2026						
August 2026						
September 2026						
Total						

4. What is AMBT's monthly financial impact? Provide the number of subscribers and the amount AMBT has received in federal LifeLine subsidies and other revenues on a monthly basis for each month after December 2025.

AMBT's monthly financial impact is the loss of revenue associated with not receiving reimbursement for its provision of LifeLine service since September 2025. The amount of that financial impact is currently over $8.7 million (as stated in the response to question 3) – and that amount continues to grow each month.

The following table identifies the number of subscribers and the amount AMBT received in federal Lifeline subsidies and other revenues on a monthly basis for each month since December 2025.

Month	Subscribers Claimed	Federal Lifeline	Other Revenue	Total
December 2025	[redacted]	[redacted]	[redacted]	[redacted]
January 2026	[redacted]	[redacted]	[redacted]	[redacted]
February 2026	[redacted]	[redacted]	[redacted]	[redacted]
March 2026	[redacted]	[redacted]	[redacted]	[redacted]
April 2026	[redacted]	[redacted]	[redacted]	[redacted]
May 2026	[redacted]	[redacted]	[redacted]	[redacted]
June 2026	[redacted]	[redacted]	[redacted]	[redacted]
July 2026	[redacted]	[redacted]	[redacted]	[redacted]
August 2026	[redacted]	[redacted]	[redacted]	[redacted]
September 2026	[redacted]	[redacted]	[redacted]	[redacted]
Total	[redacted]	[redacted]		[redacted]

AMBT's receipt of federal Lifeline subsidies and other revenue (which is primarily from the sale of data top-ups) does not make up for the substantial amount of California LifeLine subsidies that have not been paid for over a year. When AMBT decided to become a California LifeLine service provider it developed a business model to support its successful participation in the market. That model was based on assumptions regarding the costs entailed in providing the quantity and quality of service required by the LifeLine rules, the number of subscribers it would need to enroll and maintain each month, and the amount of federal Lifeline and LifeLine subsidies it would receive for providing discounted LifeLine service to eligible California subscribers. AMBT's loss of 100 percent of its anticipated LifeLine revenue represents a loss of [redacted] of the revenues AMBT expected to receive for providing LifeLine service in California. This significant loss in revenue has caused irreparable harm by upending AMBT's business model, eroding AMBT's ability to remain current with its vendors and

contractors, and severely diminishing AMBT's credibility and goodwill that it built over the past nine years as a California LifeLine service provider.[11]

The financial impact of the suspension of SPIA access is also demonstrated by the [redacted].

[11] *See* Motion, at 32-39 for a discussion of the irreparable harm faced by AMBT.

[12] The actual number of subscribers claimed is lower than the number of weighted average lines per month. This is because subscribers that are in a non-usage cure period are included in the weighted average lines count, but are not claimed by AMBT.





5. Does CPED continue to dispute the validity of ongoing reimbursement claims submitted? For what reason, and how does CPED think this will be resolved through the proceeding?

This question is exclusively directed to CPED. Therefore, AMBT is not providing a response.

CONCLUSION

For the reasons stated in AMBT's Motion for Preliminary Injunction, Reply in Support of Its Motion for Preliminary Injunction, and in this Response, AMBT respectfully requests that the Commission grant the Motion.

Respectfully submitted,



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