

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch**

**RESOLUTION T-17757
November 4, 2021**

R E S O L U T I O N

Resolution T-17757 – Rescission of TruConnect Communications, Inc.’s Advice Letter 38 requesting authorization of LifeLine/Emergency Broadband Benefit plans, conditionally approved May 10, 2021.

SUMMARY

This Resolution rescinds our conditional approval of Advice Letter (AL) 38, filed by TruConnect Communications, Inc. (U-4380-C) (TruConnect) on April 27, 2021. AL 38 sought approval for TruConnect to offer certain federally-subsidized Emergency Broadband Benefit (EBB) plans to its California LifeLine customers. The Communications Division (CD) conditionally approved AL 38 on May 10th, effective May 12th, 2021, in time for the national launch of the EBB program. On June 22, 2021, CD staff notified California LifeLine carriers (including TruConnect) that prior to being offered to California LifeLine subscribers, the Universal Service Administrative Company (USAC) must also approve their EBB plans. TruConnect has failed to cooperate with CD staff’s directives to provide documentation of such approval; therefore, we rescind our conditional approval of AL 38. The Commission sets the permissible rates and charges for LifeLine customers¹; unless the LifeLine/EBB plans are approved by USAC they are not approved by the Commission, and thus those plans may not be offered.

BACKGROUND

The Emergency Broadband Benefit (EBB) is a temporary public assistance program Congress authorized in the Consolidated Appropriations Act of 2021. Congress authorized the FCC to spend up to \$3.2 billion providing discounts of up to \$50 per month for broadband services for eligible consumers (or \$75 per month for consumers living on qualifying Tribal lands), as well as a one-time discount of up to \$100 for the purchase of a desktop computer, laptop, or tablet.² Any person eligible for national Lifeline is deemed eligible for EBB.

TruConnect, Boomerang, Telrite, and Tracfone filed advice letters requesting approval of their EBB service offerings to their LifeLine customers. Staff recognized the need to move quickly in order to maximize the federal benefits available to low-income Californians, and conditionally approved all

¹ Public Utilities Code Section 873.

² <https://www.fcc.gov/broadbandbenefit>

four advice letters in time for the May 12, 2021 national launch of EBB. In its conditional approvals and in meetings with the stakeholder working groups, staff cautioned providers that details of EBB's interaction with the California LifeLine program were still being finalized, interpreted, and implemented, and that the conditional approval of the advice letters could be reconsidered and further actions taken, as necessary.

On April 27, 2021, TruConnect filed Tier II AL 38, seeking approval for its EBB plans. Conditional approval was granted on May 12, 2021, and TruConnect began offering its EBB plans to its California LifeLine subscribers.

Among other requirements, in meetings with the stakeholder working groups on April 27, 2021, and May 11, 2021, CD staff stated that all LifeLine/EBB plans submitted for approval by LifeLine must be approved by USAC. Staff also informed stakeholders at these working group meetings that EBB providers are not permitted to add the price of a California LifeLine plan on top of the price of a USAC-approved EBB plan. Staff reiterated these rules in an administrative letter dated June 22, 2021, and clarified that the price of LifeLine/EBB plans submitted to LifeLine may not exceed the price approved by USAC. In addition to the June 22, 2021, administrative letter, staff made it clear in several meetings and emails that all service providers offering EBB benefits to LifeLine subscribers are required to submit revised advice letters with documentation that their EBB plan(s) were approved by USAC.

As a result of the June 22, 2021 administrative letter, Tracfone, Telrite, and Boomerang filed revised advice letters which staff approved. TruConnect's AL 38 sought approval for two LifeLine/EBB service plans: a \$110 plan using the federal enhanced tribal discount and a \$105 plan for all other LifeLine participants. Both of these plans offered unlimited voice minutes, unlimited texts, and 14 GB of data. However, USAC approved only two TruConnect plans for participation in EBB: a \$40 plan that offers 8GB of data, and a \$50 plan that offers unlimited data, with 8 GB of high-speed data. Despite CD staff's directives, TruConnect has failed to provide documentation of USAC's authorization for the \$110/\$105 EBB plans. USAC has informed the Commission that it has denied TruConnect's application for \$65/month and \$75/month EBB plans (providing 12.5 and 14 GB respectively).

All subsequent EBB-related advice letters were required to provide documentation of USAC-approval, including the cost of the plan authorized by USAC. Plans that had already been approved were required to be resubmitted with appropriate documentation. All providers except TruConnect have since amended their advice letters or replaced them to include documentation of USAC approval, so that the cost matches what USAC authorized.

TruConnect did not respond to inquiries from CD staff on June 29th and from Legal Division staff on July 19th, 2021; in those communications, CPUC staff stated that TruConnect's LifeLine/EBB plan in Advice Letter 38 would be considered ineligible for reimbursement claims effective July 1, 2021.³ TruConnect notified CD staff on September 21, 2021, that it does not consider the approval of AL 38 to be conditional, and refused to amend, replace, or withdraw it. TruConnect seeks

³ To show good faith, the Commission paid claims for EBB plans offered in May and June of 2021, including for TruConnect, while it was determining what plans had been approved by USAC.

subsidies from the California LifeLine fund for the cost difference between its federal subsidies (up to \$59.25 per subscriber) and its \$105/\$110 EBB plans, up to the maximum California LifeLine subsidy of \$14.85/subscriber/month.

DISCUSSION

The Commission sets the rates and charges for LifeLine service.⁴ Unapproved LifeLine plans are prohibited. The EBB program provides an additional federal subsidy on an emergency basis, to assist low-income LifeLine subscribers across the country who have been affected by COVID-19. To receive approval for their LifeLine service plan offerings, California LifeLine service providers who elected to participate in the EBB program and desired to offer EBB plans as part of their authorized California Lifeline plans, regardless of whether they are seeking the California LifeLine subsidy, were required to file a Tier 1 for wireline or a Tier 2 wireless Advice Letter in accordance with General Orders 96B and 153.⁵ As described above, staff informed prospective EBB providers that EBB LifeLine service offerings must be approved by, and at the same rates/prices, as those approved by USAC.

TruConnect received approval from USAC to offer two EBB plans: a \$40 plan that offers 8GB of data and, a \$50 plan that offers unlimited data, with 8 GB of high-speed data. Both plans also provide unlimited calling and texting. These plans are subsidized by the \$3.2 billion appropriated by the federal government as part of the Consolidated Appropriations Act of 2021. The public interest is sufficiently served by having these two EBB plans available to TruConnect's qualifying low-income California LifeLine subscribers. Reimbursing TruConnect additionally places an unnecessary burden on the California LifeLine Fund from which TruConnect seeks an extra \$14.85 subsidy per each subscriber who is already receiving unlimited calling, texting, and data.

CD staff appropriately expedited the approval of EBB providers' ALs in order to more quickly provide financial assistance to low-income Californians. Further, we affirm CD staff's placement of conditions on such approval, in order to provide time for CD staff to verify that the information the EBB providers included in their ALs is accurate and complete.

In working group meetings in 2021, and by letter dated June 22, 2021, CD notified EBB providers that their EBB plans must be approved by USAC. USAC has approved TruConnect's \$40 and \$50 EBB plans; but TruConnect has failed to provide any documentation showing that USAC approved TruConnect's costlier plans described in AL 38, despite repeated requests from CD staff. TruConnect has indicated to staff that it will not provide such documentation and will continue to offer the unapproved plans.

Therefore, CD shall withhold payment of subsidies from the LifeLine fund to TruConnect for unapproved EBB plans, until and unless TruConnect provides proof of USAC approval for those plans.⁶ TruConnect is not authorized to offer EBB plans to California LifeLine subscribers that have not been approved by USAC and by the Commission.

⁴ Section 873.

⁵ See June 22, 2021, letter CD Director Robert Osborn to LifeLine providers.

⁶ CD has already paid claims for EBB plans offered in May and June of 2021, including by TruConnect.

TruConnect's unapproved LifeLine/EBB plans are ineligible for claims as of July 1, 2021, and TruConnect's AL 38 is rescinded. TruConnect must submit a new advice letter complying with the program rules of LifeLine and EBB. If TruConnect does not do so, TruConnect shall immediately communicate to its LifeLine/EBB subscribers information on how to switch to other service providers with approved LifeLine/EBB plans. TruConnect shall also communicate to its LifeLine/EBB subscribers that if they choose to stay with TruConnect, they will revert to regular LifeLine plans immediately. TruConnect shall submit a draft of the customer notice to CD for review, no later than November 12, 2021, and shall provide the notice to customers no later than December 1, 2021.

NOTICE OF POTENTIAL PENALTIES

TruConnect knowingly continued to offer EBB plans to LifeLine subscribers in California and those plans were not approved, or contained prices greater than authorized, despite staff's repeated notifications that it was not authorized to do so. The record recited above shows that TruConnect deliberately disregarded staff's direction to submit evidence that its EBB plans were approved by USAC, or that the EBB plan prices did not exceed the amount approved by USAC. The June 22, 2021, letter from CD Director Robert Osborn to the participating carriers sufficiently placed TruConnect on notice that EBB service providers are only authorized to offer EBB service offerings that have been approved by USAC and at the same rates/prices as approved by USAC. (See Attachment A.) Therefore, we direct TruConnect to provide an explanation as to why the Commission should not consider taking enforcement action against TruConnect, including possibly imposing fines or penalties. TruConnect shall submit its explanation to the Director of CD by November 19, 2021.

PARTIES' COMMENTS

In compliance with Public Utility Code § 311(g), the Commission emailed a Notice of Availability on October 1, 2021 informing all parties on the general service list of the availability of this Resolution for public comments at the Commission's website www.cpuc.ca.gov. The notice letter also informed parties that the final conformed resolution adopted by the Commission will be posted and available at this same website.

FINDINGS

1. On April 27, 2021, TruConnect filed Advice Letter 38 requesting approval of two EBB plans for amounts that exceeded the price of the plans authorized by USAC.
2. On April 27 and May 11, 2021, CD staff stated to prospective EBB providers that all California LifeLine/EBB plans submitted for approval to the LifeLine program must be approved by USAC.
3. On May 11, 2021, staff conditionally approved Advice Letter 38 in time for the nationwide launch of the EBB on May 12, 2021.
4. On June 22, 2021, CD Director Robert Osborn issued a letter to prospective EBB providers informing them that service providers may only offer EBB service offerings that have been approved by USAC, and EBB service offerings must be at the same rates/prices as approved by USAC.

5. On June 29, 2021, staff informed TruConnect that it had learned from USAC that the plans in Advice Letter 38 exceeded the price of the plans authorized by USAC, and that LifeLine subsidies for unapproved EBB plans would be denied.
6. On July 19, 2021, staff reiterated to TruConnect that TruConnect had failed to provide proof that its EBB plans were approved by USAC and therefore are ineligible for subsidies. To date, TruConnect has not provided proof of USAC approval for the costlier EBB plans described in AL 38.
7. Staff directed TruConnect to withdraw, amend, or replace Advice Letter 38; to date, it has not done so.
8. Advice Letter 38 from TruConnect does not comply with the program rules of California LifeLine, because TruConnect's EBB plans exceed the amount approved by USAC. To date, TruConnect has not provided proof that its costlier plans in AL 38 were approved by USAC.
9. TruConnect has refused to withdraw, amend, or replace AL 38, on the grounds that it believes AL 38 was approved without conditions and is therefore valid.

THEREFORE, IT IS ORDERED that:

1. Approval for Advice Letter 38 from TruConnect Communications, Inc., submitted on April 27, 2021, and conditionally approved on May 12, 2021, is rescinded.
2. If TruConnect wishes to continue to offer EBB plans to California LifeLine subscribers, TruConnect shall submit an advice letter that complies with California LifeLine program rules, and specifically provides proof of USAC approval for any service offerings contained therein.
3. Any future TruConnect EBB service plan offerings must be at the same rates/prices as approved by USAC.
4. Effective July 1, 2021, requests for subsidies from the California LifeLine fund by TruConnect related to EBB plans that have not been approved by USAC, or in an amount that exceeds the amount approved by USAC, shall be denied.
5. If TruConnect declines to continue to offer EBB to its LifeLine subscribers, TruConnect shall immediately communicate to its LifeLine/EBB subscribers information on how to switch to other service providers with approved LifeLine/EBB plans. TruConnect shall also communicate to its LifeLine/EBB subscribers that if they choose to stay with TruConnect, they will revert to regular LifeLine plans immediately. TruConnect shall submit a draft of the customer notice to CD for review, no later than November 12, 2021, and shall provide the notice to customers no later than December 1, 2021.
6. TruConnect shall provide an explanation as to why the Commission should not consider taking enforcement action against Truconnect, including possibly imposing fines or penalties. TruConnect shall submit its explanation to the Director of CD by November 19, 2021.

This Resolution is effective today.

I certify that the foregoing Resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on _____, the following Commissioners voting favorable thereon:

Rachel Peterson
Executive Director

Attachment A: Summary Chart of AL 38 and USAC Plans:

	AL 38: EBB + CA LifeLine Bundle (STANDARD Plus 8 GB)	AL 38: EBB + CA LifeLine Bundle (TRIBAL STANDARD plus 8 GB)	USAC- Approved EBB Plan (8 GB)	USAC- Approved EBB Plan (Unlimited Data)
Regular Rate	\$105.00	\$110.00	\$40.00	\$50.00
Federal Discounts	\$49.25	\$74.25	\$40.00	\$50.00
California Discounts	\$14.85	\$14.85	\$0.00	\$0.00
Company Discount	\$40.90	\$20.90	\$0.00	\$0.00
Consumer's Rate	\$0.00	\$0.00	\$0.00	\$0.00
Minutes	Unlimited	Unlimited	Unlimited	Unlimited
Texts	Unlimited	Unlimited	Unlimited	Unlimited
Data (3G or greater Speed)	14 GB (6 GB plus 8 GB EBB)	14 GB (6 GB plus 8 GB EBB)	8 GB	Unlimited
Taxes and Fees	\$0.00	\$0.00	\$0.00	\$0.00

Attachment B: June 22, 2021 Administrative Letter

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 22, 2021

To: Service List for Rulemaking 20-02-008 and Approved California LifeLine Service Providers

Re: FURTHER GUIDANCE REGARDING THE SUBMISSION OF ADVICE LETTERS AND REIMBURSEMENT CLAIMS FOR CALIFORNIA LIFELINE SERVICE PROVIDERS WHO ARE PARTICIPATING IN THE FCC EMERGENCY BROADBAND BENEFIT PROGRAM

On April 19, 2021, the California Public Utilities Commission's (CPUC) Communications Division (CD) provided guidance to the California LifeLine service providers regarding the federal Emergency Broadband Benefit (EBB) Program. CD hereby issues this letter to provide further clarification on the EBB.

A. Summary

- Service providers must file a Tier 1 Advice Letter for wireline and a Tier 2 Advice Letter for wireless in order to offer the EBB plans to California LifeLine participants.
- California LifeLine participants must be on a standard (non-EBB) California LifeLine service plan or a California Lifeline EBB approved plan.
- Service providers may only offer EBB service offerings that have been approved by the Universal Service Administrative Company (USAC). Offerings must be at the same rates/prices as approved by USAC.
- CD is working with the California LifeLine third-party administrator (TPA) to create new service tiers for the EBB service offerings and will provide further instructions to service providers regarding assignment of customers to new service tiers.
- CD is working with USAC to coordinate and exchange California Lifeline eligibility data more frequently.

B. Guidance for Advice Letters

All California LifeLine participants must be on a California LifeLine approved plan. Accordingly, California LifeLine service providers who have elected to participate in the EBB program and desire to offer EBB plans as part of their authorized California Lifeline plans, regardless of whether they

are seeking the California LifeLine Specific Support Amount (SSA), must file a Tier 1 for wireline or a Tier 2 wireless Advice Letter in accordance with General Orders 96B and 153.

The EBB service offerings must meet the following conditions:

- Service offerings must be approved by USAC;
- Wireless EBB service offerings must meet California LifeLine's Minimum Service Standards for voice and broadband services in order to qualify for and be eligible for the SSA; and
- Prices/rates of the EBB service offerings cannot be changed. Service providers may increase or provide additional EBB service elements without changing prices/rates of the service offerings (e.g. service offerings may include more data, but prices/rates cannot be changed).

Advice Letters should also include the following:

- Details on rates and data caps for the EBB service offerings;
- Evidence/documentation of approval from USAC for the EBB service offerings. CD will separately verify with USAC that the service plans are EBB-approved;
- Advertising/marketing materials;
- Terms and conditions of the EBB plans including: 1) Duration of the EBB benefits; 2) Information that participants will remain on California LifeLine while they are on the EBB plan; 3) Information about what will happen to participants after the EBB ends (e.g. California LifeLine plan that the participants will revert back to when the EBB Program ends); 4) Commitment to notify participants at least 30 days before they are transitioned from the EBB to California LifeLine plan;
- Description of how the EBB discounts, federal and state subsidies will be applied to the EBB plans; and
- A sample customer bill showing the EBB discounts, federal and/or state Lifeline subsidies, along with other applicable discounts.

Service providers may not charge California LifeLine participants or claim conversion or connection reimbursements for transitioning participants from the EBB to a California LifeLine plan.

General Order 153, Section 9 provides that any applicable discounts or subsidies, including federal LifeLine discounts, must be deducted prior to the SSA. Accordingly, service providers must first show a deduction of the federal Lifeline support and then the EBB discount from the EBB service rates before applying the SSA. There is no minimum amount required for service providers to submit reimbursement claims.

Service providers that have previously submitted and obtained approval of their EBB service offerings or have pending EBB Advice Letters must update and/or refile the advice letters if the service offerings do not meet the requirements/conditions set forth herein.

C. Administration of EBB Participants

CD is working with the California LifeLine TPA to create new service tiers, including a federal-only designation, for the EBB service offerings. The federal-only designation will be used for California LifeLine participants who are currently meeting the LifeLine usage requirements, but whose service offerings are fully reimbursed by the EBB discounts and federal LifeLine subsidies. CD will provide further instructions to service providers about assigning customers to the federal-only designation or other new service tiers.

Additionally, the TPA will modify the Weighted Average Report (WAR) for tracking EBB participants, reimbursements and sharing of reports with USAC. For participants in the California-only LifeLine Program or service providers without an Eligible Telecommunications Carrier designation, the TPA will develop a separate service tier and participants in these groups will not be reported to USAC consistent with the current California LifeLine process.

D. Alternative Verification Process

The CPUC does not administer the AVPs. All questions about AVPs should be directed to the FCC or USAC.

CD is committed to working with USAC on any new administrative processes that further assist consumers receiving EBB benefits. We are coordinating with USAC to potentially increase the timing and exchange of California LifeLine eligibility data.

E. Expedited Schedule for Advice Letters

CD will strive to approve all correctly filed Advice Letters on an expedited schedule.

If you have any questions regarding this letter, please contact Robert Sansone at (415) 703-4683 or at rs7@cpuc.ca.gov.

Sincerely,

//s Robert Osborn
Communications Division Director
California Public Utilities Commission

Attachment C: Abbreviated Advice Letter #38⁷

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April 26, 2021

VIA EMAIL to TD.PAL@cpuc.ca.gov
Proposal and Advice Letter Coordinator
Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**RE: TruConnect Communications, Inc. (U-4380-C)
Tier 2 Advice Letter; No. 38**

Dear PAL Coordinator,

TruConnect Communications, Inc. ("TruConnect" or the "Company") files this Tier 2 Advice Letter No. 38 to notify the California Public Utilities Commission ("Commission") of its election to participate in the Federal Communications Commission's Emergency Broadband Benefit Program ("EBB").

In accordance with the **Guidance Regarding the Submission of Advice Letters and Reimbursement Claims for California Lifeline Service Providers Who Are Participating In The FCC Emergency Broadband Benefit Program**, circulated by the Commission on April 19, 2021, TruConnect hereby provides the following information in connection with its EBB service offering to California LifeLine participants:

1. TruConnect's California LifeLine Plan Comparison Chart including its EBB service plan offering is attached as Exhibit 1. This chart includes details on rates and data caps and a description of how the EBB, federal and state Lifeline subsidies will be applied to the service offering.
2. Schedule of Rates and Charges/Features Available to TruConnect's Prepaid Wireless Plans is attached as Exhibit 2.
3. Sample advertising materials are attached as Exhibit 3.

⁷ Only TruConnect's advertising materials and blank pages have been excluded.

TruConnect Communications, Inc.
April 26, 2021
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Advice Letter No. 38

4. The following web links contain details on TruConnect's service offerings and all terms and conditions and other requirements applicable to the California LifeLine program and the EBB program, including the duration of the EBB benefit.

<https://www.truconnect.com/ebb-notice>

<https://www.truconnect.com/broadband>

5. TruConnect provides its services to California LifeLine consumers on a prepaid basis therefore the requirement that a sample customer bill be provided is not applicable to TruConnect. That said, the California LifeLine Plan Comparison Chart (attached as Exhibit 1) details how EBB, federal and state support as well as Company discounts are applied.

Anyone may object to this Advice Letter by sending a written protest to: Advice Letter Coordinator, Communications Division, California Public Utilities Commission, 505 Van Ness Ave., San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based and must be received no later than 20 days after the date of this Advice Letter. A copy of the protest must also be mailed and emailed to the Company's counsel at the address listed below on the same day it is mailed or delivered to the Commission.

To obtain information about the Commission's procedures for advice letters and protests, visit the Commission's website (www.cpuc.ca.gov) and links to General Order 96-B.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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Attorneys for TruConnect Communications, Inc.

cc: Nathan Johnson
Advice Letter service list for rate changes

CALIFORNIA LIFELINE PLAN COMPARISON CHART
TruConnect

	BASIC Bundled Plan Unlimited Voice & Text Plus 4.5 GB	STANDARD Bundled Plan Unlimited Voice & Text Plus 6 GB	EBB + CA LifeLine Bundle ¹ (STANDARD Plus 8 GB)	Bundled Plan Unlimited Voice & Text Plus 4.5 GB TRIBAL BASIC	Bundled Plan Unlimited Voice & Text Plus 6 GB TRIBAL STANDARD	EBB + CA LifeLine Bundle ¹ (TRIBAL STANDARD Plus 8 GB)
Regular Rate	\$45.00	\$65.00	\$105.00	\$50.00	\$70.00	\$110.00
Federal Lifeline Discount	\$9.25	\$9.25	\$9.25	\$9.25	\$9.25	\$9.25
Federal Enhanced Tribal Discount	N/A	N/A	N/A	\$25.00	\$25.00	\$25.00
Federal EBB Discount (Temporary)	N/A	N/A	\$40.00	N/A	N/A	\$40.00
California LifeLine Discount	\$12.85	\$14.85	\$14.85	\$12.85	\$14.85	\$14.85
Additional Company Discount	\$22.90	\$40.90	\$40.90	\$2.90	\$20.90	\$20.90
Monthly Discounted Rate (Non-Tribal)	\$0.00	\$0.00	\$0.00	N/A	N/A	N/A
Monthly Discounted Rate (Tribal)	N/A	N/A	N/A	\$0.00	\$0.00	\$0.00
Number of Minutes	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Domestic Messages	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Data (3G or greater Speed)	4 GB	6 GB	14 GB (6 GB plus 8 GB EBB)	4 GB	6 GB	14 GB (6 GB plus 8 GB EBB)
Data (Throttled)	N/A	N/A	N/A	N/A	N/A	N/A
Applicable Taxes, Fees, and Surcharges	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

¹ EBB + CA LifeLine bundle plans are only available temporarily for the duration of the federal Emergency Broadband Benefit program. Customers on these plans will be notified prior to plan expiration and moved to the STANDARD plan once the program ends.

CALIFORNIA LIFELINE PLAN COMPARISON CHART
TruConnect

California LifeLine Taxes, Fees, and Surcharges Exemption	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Per Minute/Message Fee for Additional Minutes/Messages	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Fee for Additional Data	<div> <div>\$ 2.00</div> <div>\$ 5.00</div> <div>\$10.00</div> </div> <div> <div>150 MB</div> <div>500 MB</div> <div>1 GB</div> </div>					
Fee for Calling N11 Special Service Numbers	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Fee for Calling 411	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Fee for Calling Directory Assistance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Fee for Calling Operator Services	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Regular Activation Fee	\$39.00	\$39.00	\$39.00	\$39.00	\$39.00	\$39.00
Discounted Activation Fee	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Cell Phone Fee	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Restocking Fee	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Deposit	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Early Termination Fee	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Nationwide Domestic Long Distance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Caller ID	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Call Waiting	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Call Forwarding	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Voicemail	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
3-way Calling	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

CALIFORNIA LIFELINE PLAN COMPARISON CHART
TruConnect

Mobile Hotspot*	Included	Included	<u>Included</u>	Included	Included	<u>Included</u>
Rollover Unused Minutes/Text Option	Not Applicable	Not Applicable	<u>Not Applicable</u>	Not Applicable	Not Applicable	<u>Not Applicable</u>
Contract Needed	No	No	<u>No</u>	No	No	<u>No</u>
Credit Check Needed	No	No	<u>No</u>	No	No	<u>No</u>

* Feature availability based on handset capabilities and draws from existing monthly service plan data allotment.

**SCHEDULE OF RATES AND CHARGES
FEATURES AVAILABLE TO TRUCONNECT'S PREPAID WIRELESS PLANS**

Service/Feature Name	Service/Feature Definition	Regular Service / Feature Rate and Charge	Service/Feature Restrictions
Call Waiting	A feature that alerts you to an incoming call while you're on a call and allows you to switch between the two calls.	\$0.00	None
Call Forwarding	A feature whereby all calls to your mobile phone number redirect automatically to another number that you designate.	\$0.00	None
Voicemail	A feature that lets a caller to leave a message or access other available options if a line is busy or not answered.	\$0.00	None
Toll Blocking	A feature to limit toll spending thresholds on plans that are not unlimited.	\$0.00	None
International Long Distance (ILD) Blocking	A feature where outbound calls are blocked to international destinations.	\$0.00	None
900 / 976 Call Block	A feature where outbound calls are blocked to 900 and 976 numbers.	\$0.00	None
Local Calls	Any call, text message or other connection made to a location in your local calling area.	\$0.00	None
Long Distance	Any call, text message or other connection made to a location outside your local calling area.	\$0.00	None
211 - State Information	State information service.	\$0.00	None
311 - Government Information	Non-emergency government service information.	\$0.00	None

EBB + CA LifeLine Bundle (TRIBAL STANDARD Plus 8 GB)*	Unlimited Talk & Text 14 GB Data	\$110.00	\$0.00 (only available to Tribal Residents)	Additional data: \$2.00 150 MB \$5.00 500 MB \$10.00 1 GB	Eligible
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¹ Reflects plan charge after California LifeLine subsidy, federal LifeLine subsidy (including enhanced tribal if applicable), and any additional Company discounts are applied.

*EBB + CA LifeLine bundle plans are only available temporarily for the duration of the federal Emergency Broadband Benefit program. Customers on these plans will be notified prior to plan expiration and moved to the STANDARD plan once the program ends.

Activation Fee (TruConnect Discounted)	A charge to activate service	\$0.00	A one-time activation fee of \$39.00 will be charged to all new or transferred accounts. The California LifeLine Fund will pay for no more than two activation fees per year per eligible LifeLine household. If the LifeLine household is not eligible to receive the \$39.00 activation fee from the California LifeLine Fund, TruConnect will use its own funds to credit the activation fee.
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**SCHEDULE OF RATES AND CHARGES
FEATURES AVAILABLE TO TRUCONNECT'S PREPAID WIRELESS PLANS (continued)**

Plan	Plan Includes	Regular Plan Charge	LifeLine Plan Charge ¹	Additional Charges	California LifeLine Eligible
BASIC Unlimited Talk & Text Plus 4.5 GB Data	Unlimited Talk & Text 4.5 GB Data	\$45.00	\$0.00	Additional data: \$2.00 150 MB \$5.00 500 MB \$10.00 1 GB	Eligible
STANDARD Unlimited Talk & Text Plus 6 GB Data	Unlimited Talk & Text 6 GB Data	\$65.00	\$0.00	Additional data: \$2.00 150 MB \$5.00 500 MB \$10.00 1 GB	Eligible
EBB + CA LifeLine Bundle (STANDARD plus 8 GB)*	Unlimited Talk & Text 14 GB Data	\$105.00	\$0.00	Additional data: \$2.00 150 MB \$5.00 500 MB \$10.00 1 GB	Eligible
Unlimited Talk & Text Plus 4.5 GB Data (Tribal BASIC)	Unlimited Talk & Text 4.5 GB Data	\$50.00	\$0.00 (only available to Tribal Residents)	Additional data: \$2.00 150 MB \$5.00 500 MB \$10.00 1 GB	Eligible
Unlimited Talk & Text Plus 6 GB Data (Tribal STANDARD)	Unlimited Talk & Text 6 GB Data	\$70.00	\$0.00 (only available to Tribal Residents)	Additional data: \$2.00 150 MB \$5.00 500 MB \$10.00 1 GB	Eligible

SCHEDULE OF RATES AND CHARGES FEATURES AVAILABLE TO TRUCONNECT'S PREPAID WIRELESS PLANS (continued)				
411 - Directory Services	411 gives you access to telephone numbers and addresses of business, government, and residential listings.	\$0.00	Note: Limited to 5 (five) 411-Directory Assistance per month	
511 - Transportation Information	Non-emergency government service information.	\$0.00	None	
611 - Customer and Repair Service	Customer service and repair information.	\$0.00	None	
711 - TRS Relay Access	FCC adopted use of the 711 dialing code for access to Telecommunications Relay Services (TRS).	\$0.00	None	
811 - Call Before You Dig (CBUD) Information	CBUD information to protect pipes.	\$0.00	None	
911 - Emergency Services	Emergency call number based on location information available.	\$0.00	None	
0 - Operator Services Live	Live Operator	\$0.21 per call and \$0.12 per minute	None	
0 - Operator Services Automated	Automated Operator	\$0.18 per call and \$0.12 per minute	None	
0 - Operator Services Person-to-Person	Person-to-Person Operator Assisted	\$0.00	None	
Deaf / Disabled Service	Second line available to deaf and disabled Lifeline Subscribers.	\$0.00	Note: Available to qualified deaf or disabled CA Lifeline Subscribers. Second line only eligible for CA Lifeline subsidy.	
Activation Fee (applies to all retail and e-commerce prepaid mobile plans)	A charge to activate service	\$39.00	A one-time activation fee of \$39.00 will be charged to all new or transferred accounts.	