

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

**Communications Division**  
**Carrier Oversight & Programs Branch**

**Resolution T-17831**  
**August 22, 2024**

**RESOLUTION**

**Resolution T-17831: This Resolution approves the request of Sequoia Wireless, LLC to be authorized as a California only California LifeLine Provider to offer discounted prepaid wireless telephone services supported by the California LifeLine Program to Eligible low-income households throughout California.**

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**Summary**

By this Resolution, the California Public Utilities Commission (CPUC or Commission) approves the request of Sequoia Wireless (U-4565-C) to be designated as an authorized California Only California LifeLine Provider. The company is authorized to provide discounted prepaid wireless telephone services to eligible California households throughout California, where its underlying carrier, T-Mobile, provides wireless services in California, as indicated in Attachment A.

The Commission specifically approves the following prepaid plan as eligible for California Only California LifeLine support:

- *California LifeLine Bundled Standard Plan* - Unlimited voice and text with 6 GB data for \$0 per month (Free refurbished data-enabled handset or SIM card for own device).

**Sequoia Wireless Company's Advice Letter**

On February 8, 2024, Join LifeLine LLC, dba Sequoia Wireless, submitted a Tier 3 Advice Letter (AL) 7 to the Commission requesting to be a California Only California LifeLine provider to offer discounted prepaid wireless telephone services to eligible households in California.

Sequoia Wireless proposed one prepaid California LifeLine service plan, applying the California LifeLine support amount of \$19.00, respectively:

- *California LifeLine Bundled Standard Plan* – Unlimited talk and text with 6 GB data for \$0 per month.

The plan is subject to a \$39 activation fee which will be waived for California LifeLine participants.

As an additional option, eligible low-income households could add additional data for a fee of \$5 per GB per month.

On May 13, 2024, Sequoia Wireless, LLC filed AL Supplement 7A to reflect the legal name change from Join LifeLine, LLC to Sequoia Wireless, LLC.

**California LifeLine Program Requirements**

The purpose of the California LifeLine Program is to provide high quality, residential communications services at affordable rates to low-income citizens of California. The California Legislature directed the CPUC to ensure that the program has essential consumer protections and is competitively neutral. A carrier seeking to be a California LifeLine provider must comply with the CPUC's California LifeLine rules and requirements set forth in Public Utilities Code § 871 *et seq.*, General Order (GO) 153, and various CPUC decisions including, but not limited to, Decision (D.)17-01-032, D.14-01-036 and D.10-11-033. The carrier also must comply with all applicable CPUC rules, orders, decisions, resolutions, and the Public Utilities Code.

In order to become a California LifeLine provider, a carrier must generally demonstrate the following:

1. It has a valid, active operating authority issued by the CPUC;<sup>1</sup>
2. It is current in its remittance of CPUC User Fees and public purpose program surcharges;<sup>2</sup>
3. Its proposed offerings meet the CPUC's California LifeLine service elements;<sup>3</sup>
4. Its disclosures, schedule of rates and charges, and terms and conditions are thorough and consistent with state rules;
5. Its marketing and selling methods are consistent with D.14-01-036 and 47 C.F.R. §54.405(b); and
6. Its provisioning process is consistent with and in compliance with the California LifeLine Administrator's enrollment process, validation checks, transmission requirements, and efforts to prevent waste, fraud, and abuse. <sup>4</sup>

When a wireless telecommunications carrier becomes a California LifeLine provider, it is authorized to provide California LifeLine services statewide without any geographic restrictions.

A wireless carrier also must demonstrate that its proposed offerings meet the California LifeLine wireless service elements. The CPUC adopted the California LifeLine wireless service elements in D.14-01-036, set forth in GO 153, Appendix A-2. Some of the key service elements are as follows:

1. The provider must offer participants the ability to place and receive voice-grade calls over all distances using the public switched telephone network or successor network;
2. The provider must offer free, unlimited access to public safety N11s (211, 311, 511, 711, and 811) for California LifeLine eligible plans with 1,000 or more voice minutes, and to 911 emergency services for all California LifeLine eligible plans;
3. The provider must offer services on a non-discriminatory basis to any customer residing in the service territory;

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<sup>1</sup> See OP 3 of D.14-01-036.

<sup>2</sup> See GO 153 §§ 9.5.3.1., 9.8.5, 9.8.6, 9.9.2, 10, and 11 and OP 21 of D.13-05-035.

<sup>3</sup> See OP 26.a. of D.14-01-036, See also GO 153, Appendix A as adopted in D.14-01-036.

<sup>4</sup> On February 14, 2014, the CPUC's Communications Division issued an administrative letter titled "Guidance for Service Providers Interested in Offering California LifeLine Wireless Services Consistent with Decision 14-01-036." (Administrative Letter) [cdadvice letter filing components callwireless approved 021414.pdf](#). This Administrative Letter provides instructions and guidance for a carrier seeking to become a California LifeLine provider to offer California LifeLine wireless services.

4. The provider must offer to California LifeLine participants all handsets on the same basis as it offers to retail customers;
5. The provider must offer all plans that meet or exceed the California LifeLine service elements and are consistent with the rules on a discounted basis; and
6. The provider must provide free, unlimited access to customer service representatives in the same language in which the California LifeLine service was originally sold or marketed.
7. In addition, the wireless carrier must comply with the California LifeLine wireless service terms and conditions adopted in D.14-01-036, set forth in GO 153, Appendix A-2, including, but not limited to:
  8. The provider must exempt participants from paying CPUC User Fees, surcharges, and taxes;
  9. The provider must not assess a fee to participants for paying their bills in person by cash, check or other form of payment;
  10. The provider must allow participants to terminate service without incurring early termination fees;
  11. The provider must allow participants to return their handsets within three days of service activation for free, without incurring a restocking fee; and
  12. The provider must allow participants to purchase additional voice minutes at the lowest rate that is offered to retail customers.

To ensure that participants are adequately informed of the service plans, the California LifeLine provider must prominently disclose and disseminate terms and conditions, program information, and enrollment process to potential and existing participants in compliance with rules including, but not limited to, GO 153, Sections 4 and 5, D.14-01-036, Public Utilities Code § 876, and 47 C.F.R. § 54.405(c). Additionally, service providers must submit their marketing materials, including scripts, to the Communications Division (CD) for review and approval prior to dissemination and/or availability to the public.<sup>5</sup>

### **Company Overview**

Sequoia Wireless is a telephone corporation as defined by PUC § 234, with its principal office located at 29034 Westbourne Court, Hayward, CA 94544. Sequoia Wireless, LLC received its CPUC Wireless Identification Registration as a California provider of commercial mobile radio services (CMRS) (U-4565-C) on June 7, 2023. Sequoia Wireless does not seek federal Lifeline support at this time. Sequoia Wireless obtains wireless network access as an approved Mobile Virtual Network Operator (MVNO) of T-Mobile Wholesale (TMUS), with a contractual reseller agreement to purchase wireless telecommunications services from PWG Network Solutions (PWG), a Mobile Virtual Network Aggregator (MVNA). In addition, PWG provides integrated communications solutions including MVNO enablement, cellular carrier access aggregation, and voice/text/data services to connect with. Sequoia Wireless provides retail broadband Internet access service to end-users, provided by their underlying carrier, T-Mobile US, Inc., on the Global System for Mobile Communications (GSM) standard.

### **Compliance with Commission User Fee and Surcharge Obligations**

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<sup>5</sup> See OP 24.c of D.14-01-036.

CD staff has verified that Sequoia Wireless is current with payment of the annual CPUC User Fees and public purpose program surcharges. Sequoia Wireless is required to continue to remain current with its payments. Failure to comply may lead to enforcement action including, but not limited to, revocation of Sequoia Wireless' wireless identification registration, and/or authority to operate as a California LifeLine provider and denial and/or suspension of California LifeLine reimbursements.

**Compliance with California LifeLine Program Requirements**

CD staff finds that the proposed California LifeLine wireless telephone service plan indicated below meets the California LifeLine Program requirements and is eligible for reimbursement from the California LifeLine Fund. CD staff recommends approval of the following California LifeLine wireless service plan:

- *California LifeLine Bundled Standard Plan* – Unlimited talk and text with 6 GB data for \$0 per month.

Sequoia Wireless requests a waiver of the California LifeLine pre-qualification<sup>6</sup> requirement for its pre-paid California LifeLine wireless telephone service plan, since it will offer them on a prepaid basis, consistent with D.14-01-036. The Commission grants Sequoia Wireless the waiver, therefore Sequoia Wireless will not be subject to the pre-qualification requirement. However, Sequoia Wireless must still go through the California LifeLine Administrator to enroll and determine a consumer's California LifeLine eligibility. This pre-qualification exemption does not exempt the consumer or provider from satisfying all of the eligibility rules and the validation checks in the enrollment process and from transmitting the information necessary for the Administrator to perform its functions, such as eliminating duplicates, determining the duration of the discounts, and enrolling and de-enrolling consumers, etc. Therefore, after receipt of a participant's approval as determined by the California LifeLine Administrator, Sequoia Wireless may begin providing discounted service to the participant. The discount for the pre-paid telephone service shall begin with the date of approval notification or the date California LifeLine is activated, whichever is later. The waiver request does not apply to the post-paid telephone service plans, which Sequoia Wireless does not currently offer to participants. If Sequoia Wireless decides to offer any California LifeLine wireless telephone service plans on a post-paid basis in the future, they must submit a Tier 2 Advice Letter to add said plans, and any post-paid plans must comply with the pre-qualification requirement.

**Compliance with the California LifeLine Administrator's Requirements**

The California LifeLine Administrator is the sole entity responsible for determining eligibility and the enrollment process for both the California LifeLine Program and the federal Lifeline program. Service providers that participate in the federal and/or state program must comply with the eligibility requirements and the Administrator's enrollment process.

Sequoia Wireless agrees: 1) to comply with the Administrator's enrollment and de-enrollment processes, transmission requirements, eligibility rules, and validation checks; and 2) to facilitate, participate in, and comply with the Administrator's enrollment process to eliminate waste, fraud and abuse.

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<sup>6</sup> The Administrator developed a special process, "Status Code 53 Process," for telephone service providers offering pre-paid telephone services waiving the pre-qualification requirement. The Status Code 53 Process requires California LifeLine providers to send an update record with the Service Start Date and telephone number to the Administrator. California LifeLine service providers are only supposed to send this particular type of update record after confirming the consumer has made an outbound call.

Currently, Sequoia Wireless lacks experience with the California LifeLine Program and the Administrator's enrollment process, protocols, transmission requirements, etc. and is only in the preliminary stages of becoming and operating as a California LifeLine provider. Although Sequoia Wireless showed some understanding of the program's various processes and requirements, CD's recommendation for the company to be authorized as a California LifeLine service provider does not de facto represent Commission approval of the company's provisioning process. The program has undergone changes in its processes and requirements since the company's initial request for authorization.

Therefore, CD staff recommend Sequoia Wireless finalize its provisioning process and solidify its understanding of the program's processes with the Administrator and CD staff prior to the company launching its services. CD staff also recommends Sequoia Wireless notify the Administrator and obtain prior CD staff approval for any future changes Sequoia Wireless may propose for its provisioning process and operations including, but not limited to, Sequoia Wireless' service activation method.

#### **Public Interest Determination**

Before recommending designation of a carrier as a California LifeLine provider, Staff must determine that doing so would be in the public interest for California consumers.<sup>7</sup> Designating Sequoia Wireless as a California LifeLine provider will serve the public interest because it increases consumer choices to low-income populations in a wide service area. Upon review, Staff finds that Sequoia Wireless, LLC meets the criteria for public interest determination.

#### **Price Analysis**

When analyzing Lifeline plan pricing, CD staff relies on competitive forces to determine reasonable plan prices and compares proposed offerings to currently available California LifeLine plans and non-Lifeline retail plan prices. CD staff evaluated Sequoia Wireless' proposed offerings using the expected monthly cost to a low-income consumer based on mobile average minutes of use<sup>27</sup> and other Lifeline wireless plans.

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<sup>7</sup> In the Matter of Federal-State Joint Board on Universal Service, Report and Order, CC Dkt 96-45 (FCC 05- 46), released Mar 17, 2005 ¶ 40 and CPUC Resolution T-17002, Appendix A, Section II-G: Public Interest Determination.

The charts below compare Sequoia Wireless' available plan to similar existing plans in the market.

Comparison of Proposed California LifeLine Wireless Plans to other Prepaid Federal Lifeline and California LifeLine Wireless Plans in Service Area									
California Plan 1									
U-# and Approving Authority	U-4565-C AL 7	U-4457-C AL 33	U-4436-C AL 63	U-4458-C AL 45	U-4451-C AL 42	U-4372-C AL 44	U-4423-C AL 43	U-4231-C AL 105	U-4231-C AL 105
Comparable ETC w/Cal.L. Wireless Plans	Sequoia Wireless California LifeLine Bundled Standard Plan	American Broadband California Plan No. 1 (Standard)	Boomerang California LifeLine Standard Plan	AmeriMex Standard California LifeLine Plan	AirVoice California LifeLine Unlimited Talk & Text w/6GB Data Plan	i-wireless (Access Wireless) California LifeLine Unlimited Talk, Text, & 6GB	Global Connection (StandUp Wireless) CA LifeLine Unlimited Talk, Text, & 6GB Data	Safelink Unlimited Talk & Text with 6 GB Data*	"Bring Your Own Phone" Program Safelink Unlimited Talk & Text with 6 GB Data
Regular Rate	\$30.00	\$34.95	\$69.10	\$49.25	\$30.00	\$45.00	\$30.00	\$24.88	\$24.88
Federal Lifeline Discount	n/a	\$9.25	\$9.25	\$9.25	\$9.25	\$9.25	\$19.00	\$9.25	\$9.25
Federal Lifeline Tribal Discount	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
California LifeLine Discount	\$19.00	\$19.00	\$19.00	\$19.00	\$19.00	\$19.00	\$19.00	\$15.63	\$15.63
Monthly Discounted Rate	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Free	Free
Additional Company Discount	\$11.00	\$6.70	\$40.85	\$21.00	\$1.75	\$16.75	\$1.75	\$0.00	\$0.00
Number of Minutes	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Domestic Messages	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Data	6 GB	6 GB	6 GB	6 GB	6 GB	6 GB	6 GB	6 GB (at 4G speed)	6 GB (at 4G speed)
California LifeLine Taxes, Fees, and Surcharges Exemption	Lifeline Participants Exempt	N/A	\$0	Lifeline Participants Exempt	Lifeline Participants Exempt	N/A	Lifeline Participants Exempt	Exempt	Exempt
Fee for Additional Data	\$5 per GB	100 MB \$6.99 250 MB \$10.99 500 MB \$19.99 1 GB \$24.99 2 GB \$45.99 3 GB \$65.99 5 GB \$79.99	\$5 for 500 MB \$10 for 1.0 GB	\$ 9.99 for 1 GB data \$18.99 for 2 GB data	500 MB for \$5.00 3 GB for \$25.00 1 GB for \$15.00 4 GB for \$32.00 2 GB for \$20.00 5 GB for \$35.00	\$1 Bolt-On = Add 0.5 GB per month up to 6 months \$5 = Add 500 MB \$10 = Add 1 GB \$25 = Add 7.5 GB \$35 = Add 8.5 GB \$50 = Add 10 GB \$70 = Add 20 GB \$110 = Add 50 GB	\$5 for 250 MB \$10 for 1.5 GB \$20 for 3 GB \$30 for 8 GB	N/A	N/A

CD staff finds that Sequoia Wireless' proposed prepaid wireless plan has equal or better value based on comparable offerings and plan pricing for low-income customers and recommends approval.

### Due Diligence Review

An integral part of CD's processing of a Service Provider request is a due diligence review to determine if the carrier has engaged in behavior that may call into question its fitness to be an approved provider to serve California consumers. The due diligence review may include, but is not limited to, conducting independent research about a carrier's past operations to provide the Commission with information that may be pertinent in deciding whether or not to approve the provider's request. Typical research methods include performing Lexis/Nexis legal resource searches, internet searches, reviewing industry and trade publications, querying other governmental agencies, reviewing a company's history of operations, and contacting the Commission's Safety and Enforcement Division and Consumer Affairs Branch.

CD staff did not uncover any fitness issues which would lead to a denial of Sequoia Wireless' request to be a California Only LifeLine provider in California. If substantive issues emerge after this

California LifeLine service provider authorization is approved which raises public interest questions about Sequoia Wireless' ability to offer subsidized program services in compliance with the authorities granted in this resolution, the Commission may pursue an enforcement action which may include fines, penalties, and the revocation of the California LifeLine authority, and/or wireless identification registration authority and denial and/or suspension of its California LifeLine disbursements.

### **Safety Considerations**

CD staff has safety concerns in two main areas of wireless phone service: the coverage of wireless mobile phone service and the ability of emergency first responders to find the location of the caller when using a mobile phone.

Where there is a lack of coverage, poor signal strength, or atmospheric or terrain conditions that affect connections, emergency calls may not be completed. In rural areas, for example, with spotty connectivity or interference (e.g. due to geographic or structural obstacles), wireless mobile resellers of wholesale facilities service cannot guarantee full, accessible emergency connections for their own customers. An incomplete emergency call can have devastating results.

Given that safety and emergency communications are common concerns for all of California's wireless customers, CD staff recommends that Sequoia Wireless be required to fully and clearly inform prospective California LifeLine participants that coverage limitations may affect wireless mobile phone service access to E-911 and/or 911 in the event of an emergency. Such disclosures include, but are not limited to, clear statements on marketing materials and conspicuous placement on the public website in the form of information content on webpages, footnotes, and/or listings on a frequently asked questions (FAQ) webpage.

### **Conclusions**

CD staff recommends approval of Sequoia Wireless to be designated as a California Only California LifeLine Provider to offer prepaid wireless telephone services supported by the California LifeLine Program throughout California where its underlying carrier, T-Mobile, provides wireless services in California.

CD staff recommends approval of the following California LifeLine prepaid wireless service plans:

- *California LifeLine Bundled Standard Plan* – Unlimited talk and text with 6 GB data for \$0 per month.

CD staff recommends that Sequoia Wireless use a Tier 2 advice letter to request future changes including, but not limited to, terms and conditions and to the approved California LifeLine wireless service plan(s).

CD staff recommends that Sequoia Wireless submit its terms and conditions, disclosures, and marketing materials, including scripts used by customer service representatives, for review and approval by CD staff before dissemination and/or availability to the public.

Additionally, CD staff recommends that Sequoia Wireless clearly label the wireless plan(s) approved by CD staff in this Resolution as "*California LifeLine Bundled Standard Plan*", and refer to the

California LifeLine Program, where applicable, in Sequoia Wireless' terms and conditions, disclosures, and marketing materials.

CD staff finds that Sequoia Wireless' provisioning process and the terms and conditions for "Service Activation" are consistent with the Administrator's Status Code 53 Process Requirements.

CD staff recommend Sequoia Wireless work with the Administrator and CD staff to finalize its provisioning process and solidify its understanding of the program's processes prior to the company launching its services.

CD staff recommends that Sequoia Wireless notify the Administrator and obtain approval of any proposed changes to Sequoia Wireless' provisioning process and operations including, but not limited to, Sequoia Wireless' service activation method.

As conditions of providing its California LifeLine supported wireless operations in California, Sequoia Wireless must comply with the following:

- File required annual reports and compliance reports to the Commission;
- Continue to comply with CPUC User Fee and surcharge remittance and reporting requirements. Failure to do so may result in enforcement action including penalties, fines, denial, suspension, and/or revocation of its wireless identification registration, and/or authority to operate as a California LifeLine provider in California and denial and/or suspension of its California LifeLine reimbursements;
- Provide terms and conditions, disclosures, and marketing materials, including scripts used by customer service representatives, to the CPUC California LifeLine staff for review and approval prior to dissemination and/or availability to the public.

### **COMMENTS**

In compliance with P.U. Code § 311(g), the Commission emailed a notice letter on July 15, 2024, informing all parties on the eligible telecommunications carrier service list and the California LifeLine proceeding list of the availability of this resolution for public comments at the Commission's website <https://www.cpuc.ca.gov/documents/>. 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 AND CONCLUSIONS**

1. Sequoia Wireless LLC, with corporate offices located at 29034 Westbourne Court, Hayward, CA, 94544, is an approved Mobile Virtual Network Operator (MVNO) of T-Mobile Wholesale (TMUS), with a contractual reseller agreement to purchase wireless telecommunications services from PWG Network Solutions (PWG), a Mobile Virtual Network Aggregator (MVNA).
2. Join LifeLine, LLC, dba Sequoia Wireless, LLC, received its CPUC Wireless Identification Registration as a California provider of commercial mobile radio services (CMRS) (U-4565-C) on June 7, 2023.



3. On February 8, 2024, Join LifeLine dba Sequoia Wireless, LLC filed Advice Letter (AL) 7 requesting authorization to be a California Only LifeLine provider to offer discounted prepaid wireless telephone services.
4. In AL 7, Join LifeLine dba Sequoia Wireless, LLC proposed one pre-paid wireless plan: *California LifeLine Bundled Standard Plan* – Unlimited talk and text with 6 GB data for \$0 per month.
5. On May 13, 2024, Sequoia Wireless submitted AL 7A reflecting a legal name change from Join LifeLine, LLC to Sequoia Wireless, LLC.
6. Sequoia Wireless, LLC should comply with CPUC User Fee and universal service public purpose program surcharge remittance and reporting requirements.
7. Failure to comply with CPUC user fee and surcharge remittance and reporting requirements may lead to enforcement action including, but not limited to, fines, penalties, and the revocation of wireless identification registration, the California LifeLine service provider authority, and/or wireless identification registration authority and denial and/or suspension of its California LifeLine disbursements.
8. Sequoia Wireless, LLC requested a waiver from the California LifeLine Program’s pre-qualification requirement for their Prepaid Plan.
9. It is reasonable to grant the waiver request of the pre-qualification requirement for Sequoia Wireless because it does not apply to wireless services.
10. If Sequoia Wireless decides to offer any California LifeLine wireless telephone service plans on a post-paid basis in the future, they must submit a Tier 2 Advice Letter to add said plans, and any post-paid plans must comply with the pre-qualification requirement.
11. Sequoia Wireless, LLC should label clearly the one wireless plan approved in this Resolution as “*California LifeLine Bundled Standard Plan*”, and refer to the California LifeLine Program, where applicable, in Sequoia Wireless, LLC’s terms and conditions, disclosures, and marketing materials.
12. Sequoia Wireless, LLC should provide to CPUC California LifeLine staff all terms and conditions, disclosures, and marketing materials including, but not limited to, customer service representative scripts, internet marketing, and posters and brochures, for review and approval prior to publication and distribution.
13. Sequoia Wireless, LLC commits to comply with the California LifeLine Program’s enrollment process, including all eligibility rules and validation checks, and to provide the Administrator all required information for the Administrator to determine eligibility.
14. Sequoia Wireless, LLC’s prepaid wireless plan has equal or better value based on comparable offerings and plan pricing for low-income customers:
  - *California LifeLine Bundled Standard Plan* - Unlimited voice and text with 6 GB data for \$0 per month (Free refurbished data-enabled handset or SIM card for own device).
15. The Communications Division conducted a due diligence review to determine Sequoia Wireless, LLC’s fitness as it relates to business practice behavior and customer protection

that may call into question its fitness to be granted authority as a California LifeLine Service Provider to serve California consumers. The Communications Division found no fitness issues.

16. The Commission may pursue an enforcement action which may include fines, penalties, and the revocation of wireless identification registration, the California LifeLine service provider authority, and/or wireless identification registration authority and denial and/or suspension of its California LifeLine disbursements should substantive issues emerge after this resolution is approved which raise public interest questions about Sequoia Wireless, LLC's operations.
17. For public safety reasons, Sequoia Wireless, LLC should clearly inform Lifeline customers that coverage limitations may affect wireless mobile service including E-911/911 emergency calls.
18. Sequoia Wireless, LLC should file a Tier 2 advice letter to request approval for any future changes including, but not limited to, terms and conditions, the approved California LifeLine wireless service plan, or to request exemptions from the All Plans Requirement and the All Handsets Requirement.
19. On July 15, 2024, the Commission emailed a draft of this resolution to the eligible telecommunications carrier and California LifeLine proceeding service lists for public comments.

**THEREFORE, IT IS ORDERED** that:

1. The Commission approves Sequoia Wireless, LLC (U-4565-C) as a California-Only California LifeLine Provider to offer prepaid wireless telephone services supported by the California LifeLine Program where its underlying carrier, T-Mobile, provides coverage.
2. Sequoia Wireless, LLC shall be authorized to offer the following California LifeLine pre-paid wireless service plan:
  - *California LifeLine Bundled Standard Plan* - Unlimited voice and text with 6 GB data for \$0 per month (Free refurbished data-enabled handset or SIM card for own device).
3. Sequoia Wireless, LLC shall comply with all CPUC rules, orders, decisions, and resolutions, the California Public Utilities Code, and LifeLine rules. Failure to do so may result in enforcement action including penalties, fines, denial, suspension, and/or revocation of its wireless identification registration, and/or authority to operate as a California LifeLine provider in California and denial and/or suspension of its California LifeLine reimbursements.
4. Sequoia Wireless, LLC's designation as a California LifeLine prepaid wireless service provider shall be contingent upon the following:
  - File required annual reports and compliance reports with the Commission.
  - Continue to comply with CPUC User Fee and surcharge remittance and reporting requirements. Failure to do so may result in enforcement action including penalties, fines, denial, suspension, and/or revocation of its wireless identification registration, and/or

authority to operate as a California LifeLine provider in California and denial and/or suspension of its California LifeLine reimbursements.

- Provide terms and conditions, disclosures, and marketing materials, including scripts used by customer service representatives, to the CPUC California LifeLine Staff at [CaLL\\_marketing@cpuc.ca.gov](mailto:CaLL_marketing@cpuc.ca.gov) for review and approval prior to offering service, dissemination and/or availability to the public.
  - Post safety related information about wireless telephone service coverage limitations on distributed terms and conditions, disclosures, marketing materials, including scripts used by customer service representatives, and on its company website.
  - Abide by all applicable state and federal consumer protection, including CPUC General Order 168, which is the Consumer Bill of Rights Governing Telecommunications Services, and comply with the CTIA-The Wireless Association's Consumer Code for Wireless Service, as it is amended, and comply with directions to carriers regarding unlocking of phones; and
  - Comply with applicable CPUC Decisions regarding emergency consumer protections and service quality rules.
5. Sequoia Wireless, LLC shall file a Tier 2 Advice Letter to request approval for any future changes to its approved designated service area. This request shall describe the areas to be served and include a list of the geographic areas and a map(s) in Shapefile format of the proposed service area.
  6. Sequoia Wireless, LLC shall file a Tier 2 advice letter to request approval for any future changes including, but not limited to, terms and conditions and to the approved California LifeLine wireless service plan.
  7. Sequoia Wireless, LLC shall comply with General Order 153 and the California LifeLine Administrator's enrollment process including, but not limited to, validation checks, transmission requirements, and efforts to prevent waste, fraud, and abuse.
  8. Sequoia Wireless, LLC shall clearly label the one wireless telephone service plan approved in this Resolution as "*California LifeLine Bundled Standard Plan*", and refer to the California LifeLine Program, where applicable, in Sequoia Wireless, LLC's terms and conditions, disclosures, and marketing materials.
  9. Sequoia Wireless, LLC shall work with the California LifeLine Administrator and Staff to finalize its provisioning process and solidify its understanding of the Program's processes prior to the company launching its services.
  10. Sequoia Wireless, LLC shall notify the California LifeLine Administrator and obtain prior approval from Communications Division of any changes to Sequoia Wireless, LLC's provisioning process and operations including, but not limited to, its service activation method.

This Resolution is effective today.

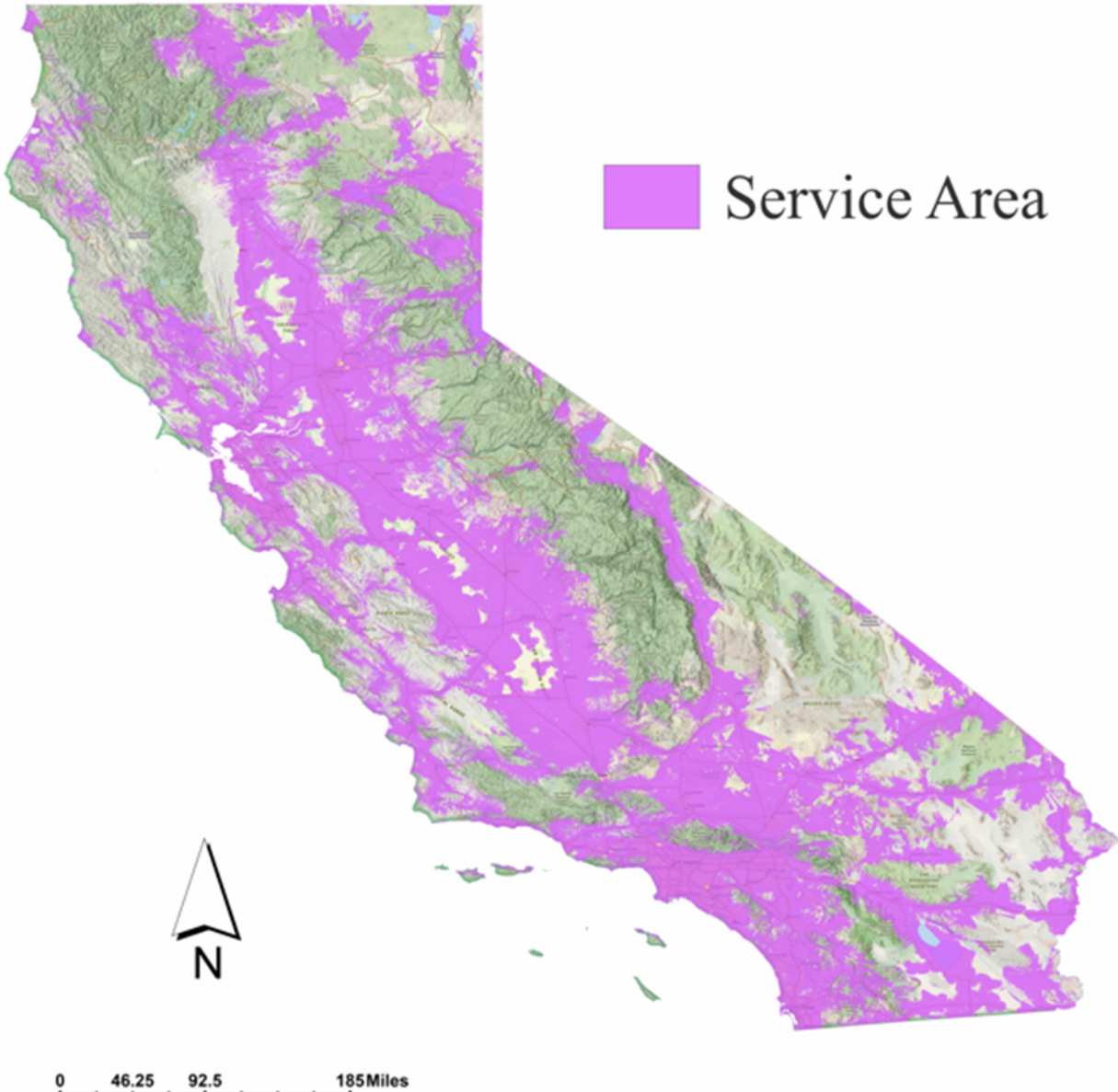
I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on August 22, 2024, with the following Commissioners voting favorably thereon:

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Rachel Peterson  
Executive Director

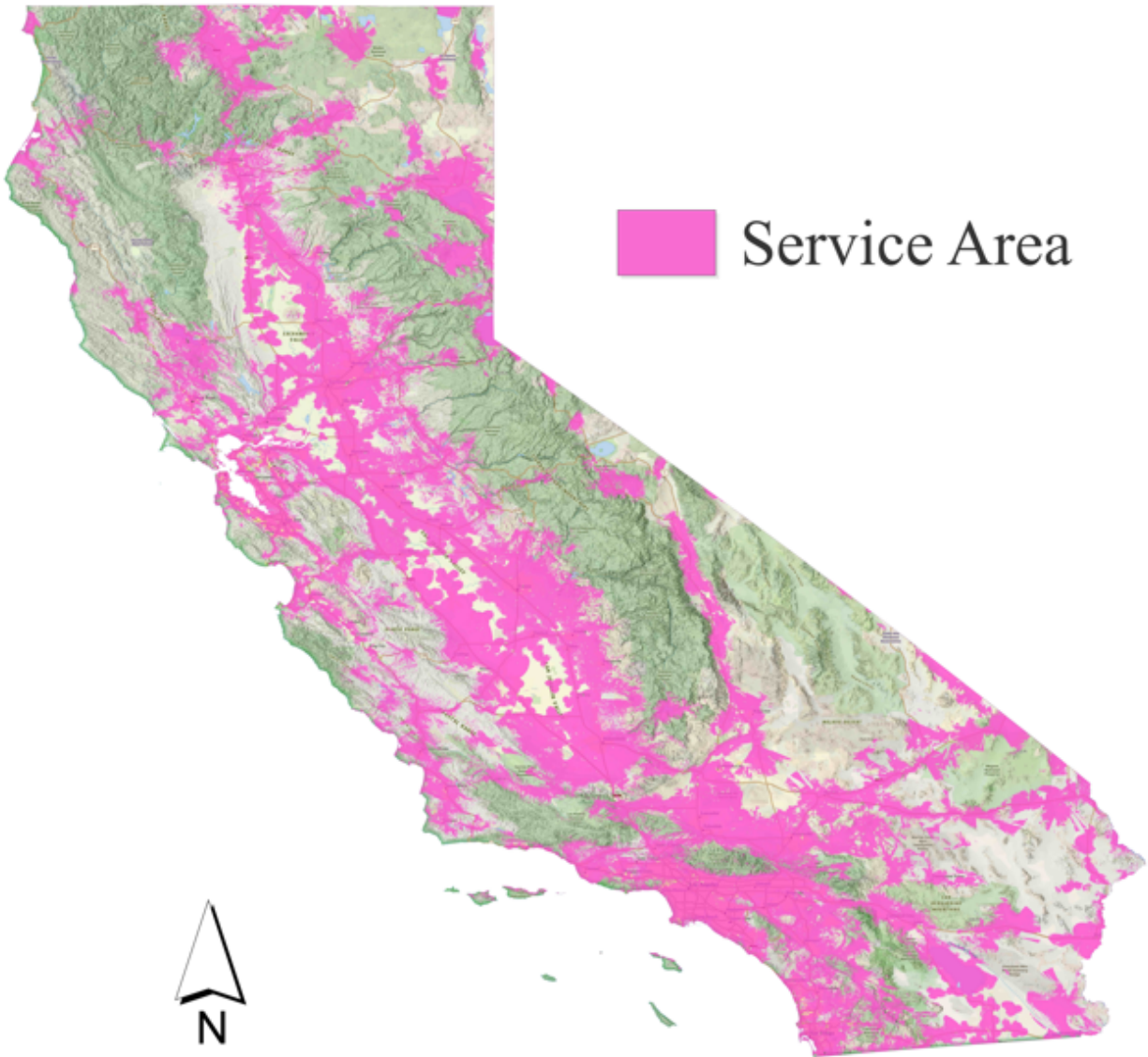
Attachment A – Sequoia Wireless, LLC Network Coverage Map

# Sequoia Wireless 4G LTE Service Area



Esri, CGIAR, USGS, Mono County, California State Parks, Esri, HERE, Garmin, FAO, NOAA, USGS, Bureau of Land Management, EPA, NPS

# Sequoia Wireless 5G Service Area



0 46.25 92.5 185 Miles

Esri, CGIAR, USGS, Mono County, California State Parks, Esri, HERE, Garmin, FAO, NOAA, USGS, Bureau of Land Management, EPA, NPS