

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight & Programs Branch**

**RESOLUTION T-17878
May 15, 2025**

R E S O L U T I O N

Resolution T-17878 Revokes the Wireless ID Registrations of WeIncentivize LLC (U-4584-C), Univasa LLC (U-4588-C), and Power Mobile LLC (U-4598-C) for failing to comply with Commission-mandated Performance Bond requirements.

SUMMARY

This Resolution approves the revocation of the Wireless ID Registrations of WeIncentivize LLC (U-4584-C), Univasa LLC (U-4588-C), and Power Mobile LLC (U-4598-C) for failure to comply with the California Public Utilities Commission's performance bond requirements pursuant to Decision (D.) 13-05-035.

BACKGROUND

The California Public Utilities Commission (Commission) has broad regulatory authority and grants telephone corporations (carriers) operating authority in California. Pursuant to Decision (D.) 94-10-031, the Commission adopted a Wireless ID Registration (WIR) process for all Commercial Mobile Radio Service (CMRS) providers (wireless carriers) within California. Additionally, D.13-05-035 established performance bond requirements for all wireless carriers. Carriers are required to comply with all federal and state statutes, rules, and regulations.

Performance Bond Requirements

CD/SKY

Pursuant to D.13-05-035, D.10-09-017/D.11-09-026, and/or D.24-11-003, all telephone corporations in California who have been granted an operating authority or registration from the Commission are required to post a continuous performance bond to facilitate collection of fines, fees, surcharges, taxes, penalties, and restitution. All carriers must not allow their performance bond to lapse during any period of its operation. The performance bond must be issued by a corporate surety company that is authorized to transact surety business in California, and the Commission must be listed as the obligee on the bond. Additionally, wireless carriers must submit a Tier-1 advice letter to the Commission's Communications Division (CD) Director containing a copy of their executed performance bond after being granted a WIR approval and at least annually thereafter, but not later than March 31 of each year.

Pursuant to D.13-05-035, CD is authorized to grant a one-time extension of 60 days for additional time for telephone corporations to submit a copy of the executed bond if the carrier makes a written request to CD before the carrier is deemed delinquent. The carrier must demonstrate good cause for the additional time requested to comply with Commission requirements to submit a copy of the executed bond. Additionally, CD is authorized to prepare for Commission consideration a resolution revoking the WIR of any registration holder that is more than 120 days late in providing CD a copy of its executed performance bond, absent a granted extension for submittal. The Commission may revoke the operating authority or registration of carriers that fail to make the required compliance filings related to performance bonds.¹

Voluntary Surrender Pursuant to Resolution T-17723

On January 14, 2021, the Commission adopted a Tier II Advice Letter (AL) process for any carrier seeking to voluntarily surrender or relinquish its operating authority; and delegated to CD the authority to approve these requests and to revoke the operating authority ministerially.

DISCUSSION

CD issued a WIR approval letter to WeIncentivize LLC (U-4584-C) (WeIncentivize) on February 1, 2024, Univasa LLC (U-4588-C) (Univasa) on April 8, 2024, and Power

¹ D.11-09-026 and D.13-05-035.

Mobile LLC (U-4598-C) (Power Mobile) on July 30, 2024, to operate as a wireless carrier in California pursuant to D. 94-10-031 (see Table below). The WIR approval letters all included information and a reminder, that as a registered wireless service provider, the carrier is a telephone corporation as defined by Public Utilities Code Section 234 and must comply with all CPUC requirements.

On the same day or next business day from CD issuing the WIR approval letters, WeIncentivize, Univasa, and Power Mobile each separately submitted to CD a request for a 60-day extension of time to comply with performance bond requirements. CD found the requests reasonable and granted the extensions. Each carrier was allowed to have an additional 60 days from their extension request to comply with performance bond requirements. See Table 1 below for carrier activities related to performance bond compliance.

Table 1: Carrier Activities Related to Performance Bond Compliance

Carrier Name and Utility ID	WIR Approval Issued/Effective Date	File Date of Extension Request	CD Approved 60-day Extension Date
WeIncentivize (U4584C)	February 1, 2024	February 1, 2024	April 1, 2024
Univasa (U4588C)	April 8, 2024	April 9, 2024	June 8, 2024
Power Mobile (U4598C)	July 30, 2024	August 1, 2024	September 30, 2024

As Table 1 above reflects, on February 1, 2024, WeIncentivize requested a 60-day extension to obtain its initial performance bond that was approved the same day, granting an extension until April 1, 2024. On April 9, 2024, Univasa requested a 60-day extension to obtain its initial performance bond that was approved the same day, granting an extension until June 8, 2024. On August 1, 2024, Power Mobile requested a 60-day extension to obtain its initial performance bond that was approved on August 5, 2024, granting an extension until September 30, 2024.

On September 30, 2024, Power Mobile requested an additional two-week extension from the original 60-day extension date that was approved the same day, granting an extension until October 14, 2024. Despite the approved extensions and multiple attempts to communicate with the carriers, WeIncentivize, Univasa, and Power Mobile all failed to comply with the performance bond requirements pursuant D.13-05-035. The

following provides a list of communication attempts to resolve outstanding performance bond issues:

- On June 5, 2024, WeIncentivize's compliance filer, Steinhart Telecom Law, informed CD staff that they would check with WeIncentivize on the status of filing their initial performance bond and would provide CD with an update. CD staff sent emails on December 6, 2024, January 8, 2025, and January 24, 2025, to follow up on the performance bond filing status. WeIncentivize did not respond to the follow up emails nor did its compliance filer on its behalf.
- On November 4, 2024, Power Mobile sent an email and informed CD staff that Power Mobile decided to cease all operations in California and will not be obtaining a performance bond due to its inability to secure additional funding, primarily because of the status of the federal Affordable Connectivity Program (ACP) which was a key element in its business focus. CD staff responded that it must submit an advice letter (AL) to voluntarily surrender its operations pursuant Resolution T-17723. CD staff sent emails on November 14, 2024, December 6, 2024, and January 10, 2025, to follow up on the voluntary surrender of operating authority. Power Mobile did not respond to the follow up emails.
- On December 9, 2024, Univasa informed CD staff that it was unable to obtain a performance bond and was working on its surcharges and user fees compliance to be able to withdraw its operating authority in California. On January 10, 2025, Univasa submitted Tier II AL No. 1 requesting voluntary cancellation of its WIR. CD staff reviewed and analyzed the AL submitted by Univasa pursuant to the requirements in Resolution T-17723 including, but not limited to, the carrier's compliance with all annual filings, and surcharge and user fee obligations. The carrier stated in its AL that it "...attempted to procure the required Performance Bond, but, due to the non-U.S. citizenship status of the owner, found the cost of the bond premium was prohibitively expensive, and furthermore, the cost of the bond premium did not justify conducting business in the state." Upon completion of the review and analysis of Univasa's Tier II AL No. 1 requesting to voluntarily surrender their operating authority, CD staff identified that the AL cannot be approved because Univasa failed to comply with performance bond requirements. Therefore, Univasa's AL No. 1 will be rejected, and their operating authority will be revoked pursuant to this resolution for failing to comply with performance bond requirements.

CD/SKY

CD staff undertook the necessary measures to notify and remind WeIncentivize, Univasa, and Power Mobile of the obligation to comply with the Commission's performance bond requirements. CD staff also provided ample time and opportunity for WeIncentivize, Univasa, and Power Mobile to comply. Despite these efforts, WeIncentivize, Univasa, and Power Mobile all failed to comply with their performance bond obligation (i.e., obtain a performance bond and maintain continuous bond coverage during its operation).

SAFETY IMPACT

This Resolution seeks to achieve carrier compliance with performance bond requirements. This promotes transparency and reduces the risk of financial harm to California customers, thereby promoting public safety.

CONCLUSION

WeIncentivize, Univasa, and Power Mobile all failed to comply with the Commission's performance bond requirements. Therefore, it is appropriate to revoke their respective WIR approvals due to failure to meet their performance bond obligations to the Commission. Although Univasa submitted an AL to withdraw their WIR, the carrier did not meet all the requirements established in Resolution T-17723 for approval of their voluntary surrender. Therefore, revoking the registration of Univasa through this resolution and denying the carrier's request to voluntarily surrender its registration, serves to promote compliance by holding carriers accountable when they fail to comply with Commission requirements.

After revoking their WIRs, WeIncentivize, Univasa, and Power Mobile must disclose this revocation in their sworn affidavit if they decide in the future to apply again for a WIR approval in California. All outstanding penalties, interest, surcharges, and user fees owed, if any, to the Commission shall be paid before any new WIR request can be approved.

Carriers that continue to operate after revocation of their operating authority or registration and fail to obtain a new operating authority or registration will be subject to enforcement action by the Commission, including possible fines or other sanctions.

COMMENTS ON THE DRAFT RESOLUTION

In compliance with Pub. Util. Code § 311 (g), a Notice of Availability was emailed on March 20, 2025, to all telephone carriers informing these parties that the draft of this Resolution is available at the Commission's website <http://www.cpuc.ca.gov/> and is available for public comments.

FINDINGS AND CONCLUSIONS

1. The Commission has broad regulatory authority and grants operating authority to telephone corporations via the Certificate of Public Convenience and Necessity Application process (pursuant to Pub. Util. Code § 1001), the Simplified Registration process (pursuant to Pub. Util. Code § 1013), the Wireless Identification Registration process (pursuant to D.94-10-031), or the Nomadic Registration process (pursuant to D.24-11-003).
2. Carriers are subject to compliance filings attendant to their operating authority.
3. All telephone corporations in California who have been granted an operating authority or registration from the Commission are required to post a continuous performance bond to facilitate collection of fines, fees, surcharges, taxes, penalties, and restitution pursuant to D.13-05-035, D.10-09-017/D.11-09-026, and/or D.24-11-003.
4. All carriers are obligated to submit their initial performance bond upon issuance of their operating authority/registration and annually thereafter, but not later than March 31 of each year, pursuant to D.13-05-035, D.10-09-017/D.11-09-026, and/or D.24-11-003.
5. The Commission has the authority to revoke the operating authority/registration of telephone carriers that fail to comply with performance bond requirements pursuant to D.13-05-035 and/or D.11-09-026.
6. Communications Division staff undertook proper and reasonable measures to inform and remind WeIncentivize, Univasa, and Power Mobile of their obligations to comply with the Commission's performance bond requirements for all telecommunications carriers.
7. If a carrier's operating authority or registration is revoked, the carrier seeking to continue operating in California must obtain a new operating authority or

CD/SKY

registration with the Commission. All carriers shall disclose the previous revocation via a sworn affidavit and pay all outstanding penalties, interest, or fines owed, if any, to the Commission in order to be granted authority to operate in California.

8. Carriers that continue to operate after revocation of their operating authority or registration and fail to obtain a new operating authority or registration should be subject to enforcement action by the Commission, including possible fines or other sanctions.
9. The Commission emailed a Notice of Availability of this Resolution on March 20, 2025, to all active carriers, including WeIncentivize, Univasa, and Power Mobile, informing them that the draft of this Resolution is available at the Commission's website <http://www.cpuc.ca.gov/> and is available for public comment.

THEREFORE, IT IS ORDERED THAT:

1. The Commission revokes the Wireless ID Registration (WIR) approvals of WeIncentivize LLC (U-4584-C), Univasa LLC (U-4588-C), and Power Mobile LLC (U-4598-C). If these carriers seek to continue operating in California, they must each submit a new WIR and disclose this revocation via a sworn affidavit in order to be granted a WIR approval in California.

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