

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division

RESOLUTION T-17889
August 14, 2025

RESOLUTION

Resolution T-17889: Revisions to General Order 153 - Aligning California LifeLine Annual Renewal Process with the Federal Lifeline Recertification Requirements (47 C.F.R. § 54.410(f)(3)(iii)).

PROPOSED OUTCOME:

- Approve. Adopt federal recertification requirements to align California LifeLine's annual renewal process with the Federal Communications Commission (FCC) Lifeline Program.

SAFETY CONSIDERATIONS:

- All service providers must inform prospective California LifeLine participants that access to Enhanced 911 (E-911) and/or 911 may be limited or unavailable in the event of an emergency or power outage.

ESTIMATED COST:

- If the change is not implemented, the California LifeLine Program risks losing federal funding of approximately \$1.4 million annually.

SUMMARY

This Resolution adopts the federal recertification rule outlined in 47 C.F.R. § 54.410(f)(3)(iii)¹ to align the California LifeLine Program's annual renewal procedures with the federal Lifeline Program. Under this rule, subscribers who are not found in any eligibility database at the time of recertification must submit a signed recertification form and supporting documentation. By doing so, the California Public Utilities

¹ 47 C.F.R. § 54.410(f)(3)(iii), available here: [eCFR :: 47 CFR 54.410 -- Subscriber eligibility determination and certification](#).

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Commission (CPUC or Commission) aims to strengthen the integrity of the annual renewal process, improve oversight, and ensure consistent treatment of subscribers at both the state and federal levels.

BACKGROUND

The California LifeLine Program and the federal Lifeline Program (Lifeline Program) both require subscribers to confirm eligibility annually to continue receiving discounted telecommunications services. Historically, the FCC allowed subscribers to self-certify eligibility during recertification if database verification was unavailable. This practice posed a risk to the Lifeline Program's integrity.

In response to these concerns, the FCC revised its regulations in 2019. Under 47 C.F.R. § 54.410(f)(3)(iii)², if a Lifeline subscriber initially qualified for the federal Lifeline Program through a verification database but is not found in any qualifying database at the time of recertification, they are required to take additional steps to confirm their ongoing eligibility. Specifically, they must submit:

- A signed annual recertification form; and
- Supporting documentation proving continued eligibility.

These changes reflect a shift toward data-driven verification and away from reliance on self-attestation.

Recognizing the importance of aligning state-level policies with federal regulations, the Commission adopts procedures consistent with the federal rules for the California LifeLine Program. This alignment involves revisions to General Order (GO) 153, which governs the California LifeLine Program. These revisions support a more rigorous and transparent approach to the annual renewal process.

By adopting these federal recertification requirements, the Commission ensures that California's LifeLine program maintains integrity, operational efficiency, and equitable access to telecommunications services for all eligible Californians.

A. Current California LifeLine Renewal Process Overview

² 47 C.F.R. §.54.410(f)(3)(iii). [eCFR :: 47 CFR 54.410 -- Subscriber eligibility determination and certification.](#)

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The California LifeLine Program continues to improve its administrative processes, including the annual renewal process. All subscribers must complete a renewal a year from their service start date, or anniversary date, to maintain their benefits. The renewal process begins 105 calendar days before a subscriber's anniversary date, giving participants adequate time to complete all necessary steps.

A key feature of the renewal process is the use of automated eligibility checks. Specifically, the Third-Party Administrator (TPA) initiates a verification query through the CalFresh Confirm Hub. This data match determines whether the subscriber is currently enrolled in CalFresh—a qualifying program for the California LifeLine program.

If a match is found, the renewal is automatically approved, and no further action is required from the subscriber. In calendar year 2024, approximately 80% of California LifeLine participants were successfully renewed through a CalFresh Confirm Hub match. This high rate of auto-renewals highlights the effectiveness and efficiency of using data-based verification tools.

However, when a subscriber is not matched in CalFresh Confirm Hub the process shifts to a more interactive model and in specific cases, self-attestation may be requested. The TPA initiates multiple outreach efforts to ensure the subscriber is informed about the renewal requirements and understands how to complete the process.

To maximize subscriber engagement and minimize confusion, the TPA uses various communication channels:

- **Text Messages:** Subscribers receive text alerts reminding them of their upcoming renewal and outlining the steps they need to take.
- **Pre-recorded Voice Calls:** Automated calls deliver renewal instructions in multiple languages, ensuring accessibility for diverse communities.
- **Call Center Support:** Subscribers may complete their renewal over the phone with assistance from a TPA representative.
- **Customer Portal Access:** The California LifeLine Customer Portal allows subscribers to complete and submit their renewal forms online, offering convenience and speed.

If a subscriber does not respond within the first 10 calendar days of the renewal window, the TPA escalates its outreach by mailing a paper renewal form. This form is

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sent in a distinctive pink envelope, clearly signaling the need for immediate attention. This additional measure helps ensure that subscribers are aware of their pending renewal, even if they missed digital communications.

Subscribers are given 44 calendar days from the beginning of the renewal period to submit a completed renewal form to the TPA. This time frame provides ample opportunity to gather necessary documentation and complete the process. If, by the end of the 44-day period, a decision on the renewal has not been made, due to an incomplete form, the subscriber is issued a “second chance” form.

This secondary opportunity extends the renewal period by an additional 20 calendar days, offering a final window for submission. The TPA uses this stage to follow up with subscribers who may need extra support or reminders.

On the subscriber’s program anniversary date, the TPA communicates the final decision regarding the renewal:

- If approved, the subscriber remains enrolled in the California LifeLine Program for another full year.
- If denied, the subscriber is removed on their anniversary date and will cease to receive discounted telecommunications services under the California LifeLine Program.

B. Federal Recertification Rules - 47 C.F.R. § 54.410(f)(3)(iii)

In the *Fifth Lifeline Reform Order*,³ the FCC implemented changes to enhance the integrity of the Lifeline Program by strengthening its enrollment and annual recertification processes. These updates were designed to reduce waste, fraud, and abuse while ensuring that only eligible individuals continue to receive program benefits.

As part of these improvements, the FCC introduced new documentation requirements for certain subscribers during the annual recertification process. Specifically, if a subscriber’s eligibility was previously confirmed through a qualifying eligibility database—either during their initial enrollment or a prior recertification—but that

³ *Lifeline and Link Up Reform and Modernization et al.*, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, WC Dkt. Nos. 17-287, 11-42 and 09-197 (rel. Nov. 14, 2019) (*Fifth Lifeline Reform Order*).

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subscriber no longer appears in any current eligibility or income database, additional steps are now required to maintain their Lifeline benefits.

In such cases, the National Verifier, state Lifeline administrator, or authorized state agency must obtain two key items from the subscriber:

1. A completed and approved Annual Recertification Form; and
2. Supporting documentation that meets the standards outlined 47 C.F.R. § 54.410(b)(1)(i)(B) or 47 C.F.R. § 54.410(c)(1)(i)(B) of the federal Lifeline Program rules.⁴

These requirements ensure that subscribers who are no longer verifiable through automated data sources can still demonstrate continued eligibility through proper documentation, preserving the federal Lifeline Program's integrity and aligning with federal accountability standards.

The Commission finds it in the public interest to adopt these procedures in the California LifeLine Program and revise GO 153 to formalize these requirements. Aligning with federal rules ensures California's processes are compliant with the federal standards while protecting public resources.

DISCUSSION

The Commission adopts the following updates to the California LifeLine Program's annual renewal process to align with federal Lifeline rules and strengthen program integrity.

In accordance with 47 C.F.R. § 54.410(f)(3)(iii), if a subscriber's eligibility was previously verified through a federal or state eligibility database—either at initial enrollment or during a prior recertification—but the subscriber is no longer listed in any current eligibility or income database at the time of recertification, they must:

- Submit a signed annual recertification form; and
- Provide supporting documentation⁵ demonstrating continued eligibility based on program participation or income.

⁴ [eCFR :: 47 CFR 54.410 -- Subscriber eligibility determination and certification.](#)

⁵ GO 153 Section 5.4.1.1.1, specifies the acceptable forms of documentation for program eligibility. <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M421/K790/421790945.pdf>. p. 14

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To implement this change, the Commission will revise GO 153, Sections 5.5 through 5.5.5. These updates will incorporate federal verification requirements into the California LifeLine Program,

Current Section 5.5 of GO 153 does not align with federal recertification requirements. It allows subscribers to self-certify continued eligibility during the annual renewal process without submitting documentation, even if they are not found in any eligibility database. While this was previously acceptable, it no longer meets federal standards and creates a misalignment between state and federal procedures.

This discrepancy introduces a compliance gap. Under the existing state renewal process, federally eligible subscribers who cannot be verified through a database may continue to receive benefits by attesting to their eligibility — without further proof. In contrast, federal rules require documentation in such cases. By updating GO 153, the Commission will close this gap, align with federal verification protocols, and reinforce the integrity of the California LifeLine Program.

Adopting federal verification procedures is part of a broader effort by the Commission to modernize and streamline the California LifeLine Program. In recent years, the California LifeLine Program has taken proactive steps to improve how eligibility is verified, particularly during the annual renewal phase. One of the most significant improvements is the establishment of an interagency partnership with the California Department of Social Services.

Through this collaboration, the California LifeLine Program's TPA now utilizes the CalFresh Confirm Hub—a system that enables automated eligibility verification by matching subscriber records with CalFresh enrollment data. This tool allows for efficient and accurate eligibility confirmation for a large portion of the subscriber base.

In 2024, the CalFresh Confirm Hub enabled the California LifeLine Program to automatically recertify nearly 80% of its subscribers, greatly reducing administrative workload and improving customer experience by eliminating the need for action from those already verified. However, a smaller segment of subscribers who are not found in the CalFresh database must still complete the renewal process manually. These individuals will be most affected by the updated documentation requirement that brings California into alignment with federal Lifeline standards.

Under the new policy, these unmatched subscribers will now be required to submit both a signed recertification form and valid supporting documentation to confirm continued eligibility. This ensures that all subscribers, regardless of database match

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status, are held to a consistent standard. It also provides greater assurance that public funds are being used appropriately and that benefits are only extended to those who qualify under established criteria.

The revised process also enhances administrative efficiency. By prioritizing automated verification through interagency data sharing and reducing reliance on manual review, the California LifeLine Program streamlines operations and minimizes the potential for human error or fraudulent reporting.

Furthermore, aligning California's procedures with federal guidelines supports long-term program sustainability. It ensures that the California LifeLine Program remains eligible for federal funding and avoids potential conflicts with federal Lifeline compliance audits or oversight reviews. In addition, it fosters a more consistent and unified experience for subscribers who may interact with both state and federal Lifeline systems.

The Commission's adoption of updated renewal procedures represents a critical step in improving the California LifeLine Program's accuracy, transparency, and accountability. By revising GO 153 to reflect federal recertification standards, the Commission ensures the California LifeLine Program remains compliant, efficient, and better equipped to serve eligible households across the state. These changes uphold the mission of the LifeLine Program while modernizing its processes to meet current and future demands.

The revisions to GO 153 Section 5.5 are set forth in the table below:

GO 153 Section	Align CA LifeLine Annual Renewal Process with 47 CFRs 54.410(f)(3)(iii)
	Proposed Changes

5.5.1.1	Program-Based Criterion: The Subscriber will be deemed eligible under the Program-Based Criterion if: (a) the Subscriber provides a signed certification that the Subscriber or a member of the Subscriber's Household is enrolled in a qualifying assistance program listed in Section 5.1.5 of this General Order; and (b) the Subscriber provides a form providing each of the required materials in Section 5.4.2 of this General Order, with initials confirming each of the attestations in the Section 5.4.2.5 of this General Order; or (c) the California LifeLine Administrator makes an eligibility determination verifies that the Subscriber meets the eligibility requirements based on database access of a qualifying program accessing one or more eligibility databases. If the Subscriber is not found in any eligibility database, to complete the renewal process, the Subscriber must submit a signed certification and supporting documentation listed in Section 5.4.1.1.1 of this General Order.
5.5.1.2	Income-Based Criterion: If the Subscriber does not have a Household nor any member of the Subscriber's household is currently enrolled in any of the qualifying assistance programs listed in Section 5.1.5 of this General Order, the Subscriber can demonstrate continued eligibility under the Income-Based Criterion if the Subscriber provides: (a) a signed certification that the Subscriber and all members of the Subscriber's Household meet or a member of the Subscriber's Household meets the income-based eligibility requirements in Section 5.1.4 of this General Order; (b) a form providing each of the required materials in Section 5.4.2 of this General Order, with initials confirming each of the attestations in the Section 5.4.2.5 of this General Order; and (c) provide documentation demonstrating that the subscriber's Total Household Income does not exceed the annual income limits established by the Commission.
5.5.3	The completed Renewal Fform and required documentation must be received by the California LifeLine Administrator on or before the due date specified on the Renewal Fform.
5.5.4	Any Subscriber who fails to qualify for continued eligibility in California LifeLine, or who fails to return the required Renewal Fform and documentation by the Deadline Date due date specified on the renewal form, shall be removed from the California LifeLine Program. Upon notification from the California LifeLine Administrator, the California LifeLine Service Provider shall discontinue LifeLine discounts to the Subscriber starting with the Denial Date provided by the California LifeLine Administrator. The Denial Date shall be no later than five business days after the expiration of the Subscriber's time to respond to the Renewal Form. No Service Conversion Charges shall be billed to the Subscriber for this change in service.

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NOTICE

Notice of Resolution T-17889 was published in the Commission Daily calendar on July 7, 2025, and mailed to the service list.

COMMENTS ON DRAFT RESOLUTION

In compliance with Public Utility Code § 311(g), the Commission emailed a letter on July 3, 2025, notifying all parties on the general service list of the availability of this Resolution for public comments at the Commission's website cpuc.ca.gov. This letter also informed parties that the final conformed resolution adopted by the Commission will be posted and available on this same website.

The Commission timely received public comments on this Resolution from The Utility Reform Network (TURN) and from Center for Accessible Technology (CforAT) on July 29, 2025. Timely reply comments were subsequently received on August 1, 2025, by AT&T and TURN. Additionally, a late reply comment was submitted by Cox on August 4, 2025. The timely received comments are discussed below. Upon review and consideration, no changes to the draft resolution were implemented based upon the comments received. Some of the suggested changes to the program received in comments are not addressed in the scope of the proposed resolution. The draft resolution conforms the California LifeLine annual renewal process to the requirements of the federal Lifeline program to ensure regulatory consistency and compliance.

In July 29, 2025, Opening Comments, TURN notes that many Californians lose LifeLine service not because they're ineligible, but because the renewal process is complex for those participants that are not found eligible through a database verification and are required to self-certify, a group in which nearly 70% fail to complete renewal. TURN asserts that reducing online renewal options and relying more on paper mail will make the problem worse, particularly for wireless users. As a solution, TURN proposes allowing continued self-certification, transferring those subscribers into a state-funded California-Only LifeLine program with a make-up of the federal Lifeline funds. TURN also highlights that the majority of subscribers qualify through CalFresh or Medi-Cal, and upcoming federal changes could further threaten eligibility. TURN also suggested

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changes to the application and renewal process instructions as well as training of outreach teams.

In July 29, 2025, Opening Comments, CforAT provided general support for aligning the LifeLine program with federal requirements but recommended an additional 30-day extension funded by the California-only subsidy for customers who fail to respond within the initial renewal timeline. CforAT argues that the extension would help prevent unnecessary service loss for eligible participants that need more time to respond.

In August 1, 2025, Reply Comments, AT&T remarks that they did not submit initial comments because they support the draft resolution to align California LifeLine's renewal process with the federal Lifeline program. However, AT&T submitted reply comments urging the Commission to reject TURN and CforAT's comments that introduce new issues and go beyond the scope of the draft resolution.

In addition, AT&T noted CforAT supports alignment in general but that creating a 90-day grace period is unnecessary because the LifeLine program already gives subscribers at least 105 days to renew.

In Reply Comments, TURN continues to oppose the draft resolution and reiterated the proposal for subscribers to continue self-certifying to receive the California-Only subsidy. TURN contends that this would help eligible subscribers maintain their service while also meeting federal requirements.

While TURN states that they appreciate CforAT's idea of giving a 30-day grace period of California-only LifeLine service after a missed renewal, they warn it could be hard to carry out. TURN notes that most wireless providers do not bill LifeLine customers and may not have the systems to start, which could cause confusion, missed payments, or service shutoffs. TURN warns that for wireline users, the extra cost during this period might make the service unaffordable.

Reply comments filed by Cox on August 4, 2025, did not comply with the deadlines for submission of specified in the draft Resolution.⁶ Staff are unable to consider these comments as part of the record.

⁶ See Commission Rules of Practice and Procedure, Rule 14.5.

FINDINGS AND CONCLUSIONS

1. Aligning the California LifeLine Program with the federal recertification requirements strengthens the integrity of the annual renewal process, improves oversight, and ensures consistent treatment of subscribers at both the state and federal levels.
2. Updating the California LifeLine Program's renewal process to conform with federal rules supports the program's continued eligibility for federal Lifeline funding.
3. In the *Fifth Lifeline Reform Order*, the FCC adopted changes to the federal recertification requirements to enhance program integrity and reduce waste, fraud and abuse.
4. Under 47 C.F.R § 54.410(f)(3)(iii), state LifeLine administrators administering the federal Lifeline program must collect both a signed annual recertification form and supporting documentation to confirm eligibility if a Lifeline subscriber's eligibility was previously verified through an eligibility database, either at enrollment or during a prior recertification, but is no longer found in any such database.
5. The California LifeLine Program's current annual renewal process allows subscribers to self-certify and does not require supporting documentation to confirm continued eligibility.
6. The Commission adopts the federal recertification rules under 47 C.F.R § 54.410(f)(3)(iii) for the California LifeLine Program renewal process, requiring subscribers not found in any eligibility database at the time of recertification to submit a signed recertification form and supporting documentation.
7. The Commission finds that changes to General Order (GO) 153, Section 5.5 to 5.5.5. are necessary and appropriate to maintain consistency with federal rules, protect program integrity, and ensure efficient and equitable access to telecommunications services.

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8. The Communications Division (CD) should oversee the implementation of the renewal changes, including revising General Order (GO) 153 Sections 5.5–5.5.5, and issue administrative guidance as needed.

THEREFORE, IT IS ORDERED THAT:

1. General Order 153 for the California LifeLine Program shall be revised, consistent with this Resolution.
2. The Commission shall adopt the federal recertification rules under 47 C.F.R. § 54.410(f)(3)(iii) for the California LifeLine Program renewal process, requiring subscribers not found in any eligibility database at the time of recertification to submit a signed certification form and supporting documentation.
3. The Communications Division shall oversee the implementation of the revisions to General Order 153 and issue administrative guidance, as needed, consistent with this Resolution.

This Resolution is effective today.

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 14, 2025, 2025; the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON

Rachel Peterson
Executive Director

ALICE REYNOLDS

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President

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

MATTHEW BAKER

Commissioners