COM/ARD/nd3 **PROPOSED DECISION Agenda ID #22773 (Rev.2)**
Quasi-legislative
10/30/2025 Item #2

Decision **PROPOSED DECISION OF COMMISSIONER ALICE REYNOLDS**
(Mailed 7/22/2024)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Update the California Universal Telephone Service (California LifeLine) Program.	Rulemaking 20-02-008

DECISION IMPLEMENTING CALIFORNIA LIFELINE ENROLLMENT PATH FOR CALIFORNIANS WITHOUT SOCIAL SECURITY NUMBERS

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DECISION IMPLEMENTING CALIFORNIA LIFELINE ENROLLMENT PATH FOR CALIFORNIANS WITHOUT SOCIAL SECURITY NUMBERS

Summary

Decision 14-01-036, *Decision Adopting Revisions to Modernize and Expand the California LifeLine Program*, determined that the California Universal LifeLine Telephone Service Program (California LifeLine) should extend eligibility to Californians without a Social Security Number (SSN). This decision establishes a process for Californians without an SSN to enroll in California LifeLine.

1. Background

In 2012, the Federal Communications Commission (FCC) revised the federal Lifeline program (Lifeline) and required applicants to provide the last four digits of their social security numbers (SSN) to receive the federal subsidy.[1] Californians expressed concern about the impact this change would have on the California Universal LifeLine Telephone Service Program (California LifeLine). At public participation hearings hosted by the California Public Utilities Commission (Commission) in Riverside, San Diego, and Los Angeles, parties commented that requiring applicants to provide an SSN may cause some otherwise eligible low-income individuals to become ineligible for California LifeLine services.[2] Such an outcome runs contrary to the Moore Universal Telephone Services Act's (Moore Act) mandate to make basic communications services at affordable rates available to the greatest number of Californians.[3]

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[1] *Lifeline and Link Up Reform and Modernization* (Fed. Communications Com. (02/06/2012) 27 FCC Rcd 6656 at 6738, no. 191); *see also* 47 C.F.R. § 54.410(d)(2)(vi).

[2] Decision (D.) 14-01-036 at 119.

[3] Public Utilities (Pub. Util.) Code §§ 871, *et seq.*

In Decision (D.) 14-01-036, the Commission authorized eligible Californians without SSNs to participate in California LifeLine.[4] The Commission only required that eligible Californians provide government-issued identification when applying for California LifeLine.[5] It deferred further implementation details, such as the types of acceptable identity documents and whether the California LifeLine Fund would make up for the lack of any federal Lifeline support, to a later time.[6]

D.14-01-036 also stated that Commission staff would file a waiver petition with the FCC regarding the SSN requirement.[7] The Commission filed a waiver petition with the FCC in February 2015.[8] In 2016, the FCC stated a policy that it no longer wished to support program rule exceptions for individual states.[9] The petition is still pending.

1.1. Current Enrollment Process

The Commission operates California LifeLine through a Third-Party Administrator (TPA) with funds collected through a surcharge on all telecommunications lines in California. However, the program relies heavily on

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[4] D.14-01-036 at 170, Conclusion of Law 46.

[5] *Ibid*.

[6] *Id*. at 122, 124.

[7] *Id*. at 124.

[8] *Id. at* 173, Ordering Paragraph (OP) 17; *see also Staff Proposal for California LifeLine Program: Enrollment Path for Individuals without Social Security Numbers* (Staff Proposal) at 2.

[9] *In the Matter of Lifeline and Link Up Reform and Modernization, et al.*, Third Report and Order *et al.*, WC Docket No. 11-42, FCC 16-38 (rel. April 27, 2016) at para. 212 (stating, "[w]e amend our rules to remove state-specific eligibility criteria for Lifeline support").

private participating telecommunications companies (service providers) to enroll new participants.

Most California LifeLine participants enroll through "Street Teams," which work for individual service providers. Street Teams conduct in-person outreach and enrollment in areas more likely to have eligible participants, such as outside social service benefits offices or county buildings.

1.2. Prevention of Waste, Fraud, and Abuse and Use of Applicants' Social Security Numbers

The Commission has various methods to guard against waste, fraud, and abuse of public California LifeLine funds. For example, the Commission requires service providers to reimburse subsidies connected to fraudulent applications. The Commission also requires applicants to provide identity verification documents, which the TPA's Customer Service Representatives (CSRs) manually review.[10]

In addition, the Commission may use an applicant's SSN for other programmatic purposes. Specifically, and as discussed further in Section 3.1.5 below, California LifeLine leverages applicants' participation in other social service programs to automatically verify eligibility. Some of these other social services programs, such as CalFresh, require applicants to provide an SSN with limited exceptions.[11] When California LifeLine applicants also provide an SSN, the TPA can cross check the number with other programs' databases to verify eligibility and streamline enrollment and renewal.

[10] *See* Staff Proposal at 3, 5.

[11] CalFresh is known federally as the Supplemental Nutrition Assistance Program (SNAP).

Additionally, the FCC requires that applicants provide an SSN to qualify for the federal Lifeline subsidy. To comply with the FCC requirement so that Californians qualify for $100 million to $150 million in annual federal subsidies, California LifeLine asks that applicants provide an SSN.

1.3. Procedural Background

On August 30, 2023, the Commission received a letter from the nonprofit organization Neighborhood Legal Services of Los Angeles (NLSLA) requesting immediate implementation of D.14-01-036 regarding extending California LifeLine eligibility to Californians without an SSN. On September 7, 2023, Commissioner Shiroma responded to NLSLA's letter, and the Commission hosted a "LifeLine Stakeholder Roundtable" on October 4, 2023. In a letter dated December 1, 2023, NLSLA reiterated its concerns about the Commission's delayed implementation of D.14-01-036.

On December 19, 2023, Commissioner Shiroma issued an Assigned Commissioner Ruling (ACR) requesting comments on ways to implement a process for Californians without SSNs to participate in the California LifeLine program. On January 26, 2024, the Commission received opening comments on the ACR from the following: Assurance Wireless (Assurance); Pac Bell Telephone Company (AT&T); the California Public Advocates Office of the Commission (Cal Advocates); Cox California Telecom (Cox); the National LifeLine Association (NaLA);[12] TracFone Wireless Inc. and Cellco Partnership (TracFone);

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[12] NaLA consists of Boomerang Wireless, LLC; AmeriMex Communications Corp. dba SafetyNet Wireless; American Broadband & Telecommunications Company; Global Connection Inc. of America d/b/a StandUp Wireless; i-wireless, LLC; and TrueConnect Communications, Inc.

NLSLA, Legal Aid Association of California, Homeless Action Center, and Maternal and Child Health Access (Low-Income Advocates); the Small Local Exchange Carriers (Small LECs);[13] and The Utility Reform Network (TURN) and The Greenlining Institute (GLI). On February 23, 2024, the Commission received reply comments on the ACR from the following: AT&T; Cox; Low-Income Advocates; NaLA; the Small LECs; TracFone; TURN and GLI; and UNITE-LA and California Community Foundation.

The Commission's Communications Division staff (Staff) reviewed the parties' comments and drafted the *Staff Proposal for California LifeLine Program: Enrollment Path for Individuals without Social Security Numbers* (Staff Proposal), which recommended an implementation process that considered parties' ACR comments. The Administrative Law Judge (ALJ) issued a ruling on April 19, 2024, inviting parties to comment on the Staff Proposal. On May 10, 2024, the Commission received opening comments on the Staff Proposal from the following: Assurance; AT&T; Cox; Low-Income Advocates; NaLA; the Small LECs; TracFone; and TURN, GLI, and UNITE-LA (Consumer Coalition). On May 24, 2024, the Commission received reply comments on the Staff Proposal from the following: AT&T; Center for Accessible Technology (CforAT); Low-Income Advocates; NaLA; the Small LECs; TracFone; and TURN and GLI.

[13] The Small LECs consist of Calaveras Telephone Company; Cal-Ore Telephone Co.; Ducor Telephone Company; Foresthill Telephone Co.; Happy Valley Telephone Company; Hornitos Telephone Company; Kerman Telephone Co.; Pinnacles Telephone Co.; The Ponderosa Telephone Co.; Sierra Telephone Company, Inc.; The Siskiyou Telephone Company; Volcano Telephone Company; and Winterhaven Telephone Company.

1.4. Submission Date

This matter was submitted on May 24, 2024, upon submission of reply comments on the Staff Proposal.

2. Issues Before the Commission

The issues before the Commission are the implementation issues identified in D.14-01-036 and the ACR:

1. How should the Commission implement the requirements of D.14-01-036 to ensure that Californians without SSNs can participate in California LifeLine?
2. Should the California LifeLine Fund make up for all or a portion of the lack of federal Lifeline support for Californians without an SSN?
3. What types of government-issued identity documents should California LifeLine accept from participants without an SSN?

3. Discussion

3.1. Implementation Guidelines for Enrolling Californians Without Social Security Numbers

Staff will implement a process to enroll Californians without SSNs into California LifeLine, consistent with the guidelines provided in this section.

3.1.1. Timeline

The Staff Proposal describes a four-phase approach to implement D.14-01-036 that allows for an expedient near-term solution and later refinements.[14] In Phase 1, Staff recommends updating the application process by allowing individuals to check a box certifying that they are applying without an

[14] Staff Proposal at 2.

SSN.[15] During Phase 2, Staff will work with the TPA to integrate LexisNexis TrueID, a new identity verification software, to expand the acceptable forms of identification for individuals applying without an SSN.[16] In Phase 3, Staff will work with service providers that elect to integrate TrueID into their intake processes to update their systems.[17] Phase 4 proposes to shift the entry point for California LifeLine's enrollment process from service providers to the TPA.[18]

The Staff Proposal identifies an implementation timeline for Phase 1 of three months from the date the Commission approves the implementation process.[19] The Staff Proposal does not specify timelines for the other phases because they require coordination with external parties, such as the TPA and LexisNexis. While Staff cannot control when the TPA will integrate new software, the Staff Proposal notes that these changes will occur "as quickly as possible."[20]

Generally, parties support the approach described in Phase 1.[21] However, the Small LECs recommend an implementation timeline of six months and

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[15] *Id*. at 3-4.

[16] *Id*. at 4-5.

[17] *Id*. at 5-6.

[18] *Id*. at 6-7.

[19] *Id*. at 4.

[20] *Ibid*.

[21] Consumer Coalition Opening Comments on Staff Proposal at 2; Cox Opening Comments on Staff Proposal at 2; Low-Income Advocates Opening Comments on Staff Proposal at 2; NaLA Opening Comments on Staff Proposal at 2; Small LECs Opening Comments on Staff Proposal at 4; TracFone Opening Comments on Staff Proposal at 1. *But see* Assurance Opening Comments on Staff Proposal at 2-3 (opposing Phase 1 because it "places an inordinate burden on providers"); AT&T Opening Comments on Staff Proposal at 2-3.

Low-Income Advocates recommend one month.[22] Low-Income Advocates argue that the Commission expanded eligibility to Californians without an SSN ten years ago and that the proposal to implement D.14-01-036 is limited.[23]

For Phases 2 and 3, AT&T, CforAT, Consumer Coalition, Low-Income Advocates, NaLA, and the Small LECs question TrueID's cost, accessibility features, and data protection.[24] AT&T, Consumer Coalition, Cox, and the Small LECs also recommend eliminating Phase 3, which the Staff Proposal labeled as optional.[25] Some service providers state that they do not currently use TrueID in their intake processes and request more information on the cost, which entity would bear the cost, and whether they must install it.[26] Notably, parties did not oppose expanding the list of identity verification documents. Indeed, Low-Income Advocates and Consumer Coalition recommend further increasing the types of acceptable eligible verification documents.[27]

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[22] Low-Income Advocates Opening Comments on Staff Proposal at 7; Small LECs Opening Comments on Staff Proposal at 4.

[23] Low-Income Advocates Opening Comments on Staff Proposal at 7.

[24] AT&T Opening Comments on Staff Proposal at 2, 3-4; Consumer Coalition Opening Comments on Staff Proposal at 5; Low-Income Advocates Opening Comments on Staff Proposal at 5-6; NaLA Opening Comments on Staff Proposal at 3-4; Small LECs Opening Comments on Staff Proposal at 4-5; *see also* CforAT Reply Comments on Staff Proposal at 1-2.

[25] Consumer Coalition Opening Comments on Staff Proposal at 6; Cox Opening Comments on Staff Proposal at 2; *see also* AT&T Reply Comments on Staff Proposal at 3; Small LECs Reply Comments on Staff Proposal at 2.

[26] *See, e.g.,* AT&T Opening Comments on Staff Proposal at 3-4; NaLA Opening Comments on Staff Proposal at 4.

[27] Consumer Coalition Opening Comments on Staff Proposal at 4; Low-Income Advocates Opening Comments on Staff Proposal at 3-5.

Finally, for Phase 4, AT&T, Consumer Coalition, Cox, CforAT, Low-Income Advocates, and the Small LECs generally support the proposal.[28] NaLA and TracFone oppose.[29] NaLA and TracFone argue that Phase 4 is a significant programmatic change that requires more record development.[30]

Staff must balance the implementation of D.14-01-036 with the need to safeguard California LifeLine applicants' data.[31] Staff will move forward with a modified approach to the initial proposal. Rather than a phased approach, Staff will work with the TPA to create a direct enrollment pathway for individuals who are applying to California LifeLine without an SSN. Service providers will not be permitted to enroll applicants who do not provide an SSN through their proprietary systems.

This approach offers better protection for applicants' personally identifiable information by ensuring it is accessed and stored by an entity subject to the state's stringent privacy requirements.[32] It also minimizes the number of

[28] Consumer Coalition Opening Comments on Staff Proposal at 6; Cox Opening Comments on Staff Proposal at 2; Low-Income Advocates Opening Comments on Staff Proposal at 8; Small LECs Opening Comments on Staff Proposal at 5; *see also* AT&T Reply Comments on Staff Proposal at 4-5; CforAT Reply Comments on Staff Proposal at 3-4.

[29] NaLA Opening Comments on Staff Proposal at 3, 4, 5-6; TracFone Opening Comments on Staff Proposal at 3-8.

[30] AT&T Opening Comments on Staff Proposal at 4-5; NaLA Opening Comments on Staff Proposal at 5-6; TracFone Opening Comments on Staff Proposal at 3-8; *see also* Small LECs Reply Comments on Staff Proposal at 2-3.

[31] Assembly Bill (AB) 1303 (Valencia, Stats. 2025, Chap. 347) prohibits the Commission and the LifeLine TPA from providing subscriber information without a judicial warrant or court-ordered subpoena and allows the state to provide California LifeLine benefits to all Californians without regard to immigration status.

[32] *See* AB 1303.

locations where this information may be stored and accessed. Staff should ensure the TPA has successfully integrated identity verification software into the intake process to validate applicants' identity documents, and protect the California LifeLine program from approving an individual based on fraudulent documents.

Working with the TPA to create a direct enrollment pathway for individuals to apply to California LifeLine without an SSN will require modifications to the online customer portal and integration of identity verification software. Staff will implement these changes as expeditiously as possible. Staff will also provide updates, as appropriate, on the TPA's progress in implementing the enrollment pathway for applicants without an SSN, including progress on the customer portal changes and the integration of identity verification software.[33] Staff is authorized to amend the TPA contract to implement the changes to the application and enrollment processes, as well as the identity verification software.

3.1.2. Application Update: Dual Pathway

In updating the California LifeLine application to comply with D.14-01-036, we reiterate that we are not eliminating the pathway for applicants with an SSN to enroll in the program with their last four digits. Applicants will still be able to apply for the program using the last four digits of their SSN to receive the federal subsidy, as required by the FCC.[34] This decision updates

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[33] We address parties' concerns about accessibility and privacy in Section 3.1.7.1 below.

[34] *Lifeline and Link Up Reform and Modernization* (Fed. Communications Com. (02/06/2012) 27 FCC Rcd 6656 at 6738, no. 191); *see also* 47 C.F.R. § 54.410(d)(2)(vi).

California LifeLine to implement a second application pathway for applicants without an SSN.

To accomplish a dual application pathway for Californians with and without SSNs, the Staff Proposal recommends including a "no-SSN check box" in the online and hardcopy application.[35] Applicants who click or fill in the no-SSN check box would then receive instructions unique to the no-SSN pathway.

NaLA, the Small LECs, TURN and GLI, and TracFone generally support this dual application pathway because it does not create the impression that applicants who have an SSN have the option not to provide it.[36] We agree. Therefore, the California LifeLine application will be updated to include both the option for an applicant to provide the last four digits of their SSN and the option to select the "no-SSN check box."

Service providers that participate in California LifeLine may not enroll applicants who do not provide an SSN through their proprietary systems.[37] In comments on the Proposed Decision, Assurance argues that SSNs are critical

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[35] Staff Proposal at 3.

[36] NaLA Opening Comments on Staff Proposal at 2 (supporting measures to "ensure that applications that do not collect an SSN are the exception rather than the rule"); Small LECs Opening Comments on Staff Proposal at 2; TracFone Opening Comments on Staff Proposal at 1, 2 (supporting generally proposed enrollment adjustments); *see also* TURN and GLI Reply Comments on Staff Proposal at 3.

[37] Assurance recommends modifying the Staff Proposal so "that providers have the option – but not the obligation – to enable the enrollment of applicants without SSNs." (Assurance Opening Comments on Staff Proposal at 2.) Giving providers the option to deny enrolling applicants without SSNs would conflict with D.14-01-036 and the Moore Act. California LifeLine service providers must enable the enrollment of applicants with and without SSNs. (General Order (G.O.) 153 § 4.1.1.)

tools for preventing duplicate applications and recommends that the Commission give providers the option not to provide service to subscribers without SSNs.[38] While tools other than SSNs may prevent duplicate applications, we nevertheless determine that providers may only enroll subscribers with SSNs through their proprietary systems. This determination is based on our concern that service providers are not subject to the same strict privacy restrictions as the Commission and the TPA.[39]

Instead, service providers are required to refer subscribers to the California LifeLine program's direct enrollment processes if they do not have an SSN. Program staff will provide updates on how these protocols will function and when they will take effect. Furthermore, to maximize participation in both federal Lifeline and California LifeLine, applicants must provide complete and accurate information in their application. If applicants do not submit complete and accurate information on their application, they may receive a correctable denial under General Order 153, Section 4.1.3.

3.1.3. Application Update: Verbiage and Language

The Staff Proposal recommends updating the online and hardcopy applications with the following introductory verbiage:

> Applicants who have a Social Security Number (SSN) must enter the last 4 digits to confirm their identity. If you do not have an SSN, check the box below to certify that you do not have an SSN, as you will be required to provide alternative

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[38] Assurance Opening Comments on Proposed Decision at 2-4.

[39] *See* AB 1303.

> form(s) of identification to validate LifeLine Program eligibility.

The Staff Proposal also recommends verbiage accompanying the "no-SSN check box," requiring eligible Californians without an SSN to certify that they "have never been assigned a Social Security Number."[40] Applicants who click or fill in the no-SSN check box will then see a notification that states:

> A Social Security Number (SSN) or proof of U.S. citizenship is not required to receive California LifeLine Program benefits. The California LifeLine Program is available to anyone who lives in California, regardless of immigration status. The California LifeLine Program will not ask anyone for their immigration status. While SSNs are not required to enroll in the California LifeLine Program, alternative forms of identity documentation will be required to confirm your identity, which may increase application review and processing time.[41]

The Staff Proposal states that the applications will be translated into Spanish, Korean, Chinese, Japanese, Tagalog, and Vietnamese.[42]

The Small LECs support the introductory language because it "effectively communicates that there are two application paths: one for those with SSNs and another for those without SSNs."[43]

For the verbiage accompanying the no-SSN check box, Low-Income Advocates argue that asking applicants to certify that they were never assigned an SSN is problematic for immigrants and applicants who cannot easily access

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[40] Staff Proposal at 3.

[41] *Ibid*.

[42] *Ibid*.

[43] Small LEC Opening Comments on Staff Proposal at 2.

their SSN, such as disaster survivors.[44] The Consumer Coalition provides additional examples of eligible Californians who may not have their SSN easily accessible, such as people who escaped domestic violence or are struggling with housing insecurity.[45] Low-Income Advocates, Consumer Coalition, and the Small LECs recommend modifying the check-box verbiage so that it states variations of "I cannot provide a Social Security Number."[46]

Low-Income Advocates, Consumer Coalition, and the Small LECs also recommend modifications to the notification that appears after applicants click the no-SSN check box.[47] In general, these parties assert that their recommended modifications will eliminate confusing verbiage and encourage applicants with an SSN to provide the last four digits.

We appreciate the Staff Proposal and parties' detailed verbiage recommendations because they provide a good starting point for the application update. When the new application first launches, the verbiage accompanying the check box shall read,

> I attest I do not have a Social Security Number to provide. I understand that I will be required to submit alternative forms of identification document(s) so the LifeLine Program can authenticate my identity.

[44] Low-Income Advocates Opening Comments on Staff Proposal at 2-3.

[45] Consumer Coalition Opening Comments on Staff Proposal at 2-3.

[46] Consumer Coalition Opening Comments on Staff Proposal at 2; Low-Income Advocates Opening Comments on Staff Proposal at 3; Small LECs Opening Comments on Staff Proposal at 3.

[47] Consumer Coalition Opening Comments on Staff Proposal at 3; Low-Income Advocates Opening Comments on Staff Proposal at 3; Small LECs Opening Comments on Staff Proposal at 2.

Additionally, we acknowledge that over time, verbiage in the application may need to be updated. Therefore, Staff may modify and update any of the verbiage in the application to respond to eligible Californians' needs, comply with state and federal requirements, and guard against waste, fraud, and abuse, as needed. Any updates made will conform to the following criteria:

1. Verbiage shall encourage applicants to provide the last four digits of their SSN if they have one;
2. Verbiage shall be sensitive to the many different situations that may make it difficult or impossible for an eligible Californian to provide an SSN; and
3. Verbiage in all translations shall be clear.

Finally, Staff will ensure that the application and outreach material is available in large print and alternative formats (*i.e.,* braille) in addition to Spanish, Korean, Chinese, Japanese, Tagalog, and Vietnamese translations. This requirement exists in General Order 153, Section 4.2.2.

3.1.4. Assistance to Individuals Without Access to Their Social Security Number or Other Eligibility Documentation

We recognize that applicants without access to their SSN or other eligibility documentation may require additional assistance with the enrollment process. Currently, the California LifeLine Call Center helps applicants sign up for the program. The Call Center is available from 7:00 a.m. to 7:00 p.m. Pacific Time, Monday to Friday, excluding state holidays.

The Commission will consider expanding this assistance with a network of trusted partners, such as government agencies and/or authorized nonprofit organizations. This framework was discussed at the October 4, 2023, LifeLine

Stakeholder Roundtable. Certain attendees expressed concerns about the proposal because of the time it would take to implement, administrative challenges, and accessibility concerns for applicants in rural areas.[48] We recognize these concerns while also recognizing the need to give California LifeLine applicants assistance that supplements what the TPA and service providers offer. The benefits of "an enrollment partner process where vulnerable populations can get assistance navigating LifeLine phone applications in trusted spaces like [Community-Based Organizations], clinics, and schools" was also recognized by Low-Income Advocates and CforAT.[49]

Therefore, to ensure that we provide sufficient enrollment assistance to applicants without access to their SSN or other eligibility documentation, Staff will develop a proposal for the trusted partner framework that addresses the following:

1. A definition of a trusted partner;
2. Review, approval, and renewal process for trusted partners;
3. A description of the authority and process trusted partners will have to enroll applicants;
4. A description of any materials and training trusted partners may receive;

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[48] TURN and GLI Opening Comments on ACR at Appendix A (stating the "largest issue with this proposal is that creating a functional, statewide network that has partnering organizations accessible to every potential LifeLine applicant could easily require years of work, and many people could still be left without an easily accessible partner organization in their area"); Cox Opening Comments on ACR at 3; NLSLA Opening Comments on ACR at 4, n.2.

[49] Low-Income Advocates Opening Comments on Staff Proposal at 8; *see also* CforAT Reply Comments on Staff Proposal at 2-3.

5. A description of any new technology or other services California LifeLine program and applicants may need to work with trusted partners;
6. Any funding information; and
7. A description of how trusted partners will interact with service providers and the TPA.

Staff will gather feedback on this proposal through a workshop and/or comments. We will then examine Staff's proposal and party feedback in a subsequent decision.

3.1.5. Program-Based Eligibility

Californians can qualify for California LifeLine through either program-based or income-based eligibility. Program-based eligibility allows individuals to qualify for California LifeLine if one or more people in their household are enrolled in certain assistance programs.[50] The Staff Proposal recommends continuing to expand database sharing with qualifying assistance programs to automatically confirm an applicant's eligibility.[51] Consumer Coalition and Low-Income Advocates recommend specifically expanding the list to include Sun Bucks, California Department of Social Services (CDSS)-administered cash-aid

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[50] Pages 7-9 of the Staff Report list the programs as Medicaid/Medi-Cal; Women, Infants and Children Program (WIC); National School Lunch Program (NSL); Stanislaus County Work Opportunity & Responsibility to Kids (StanWORKS); Welfare-to-Work (WTW); Greater Avenues for Independence (GAIN); Tribal TANF; Bureau of Indian Affairs General Assistance; Head Start Income Eligible (Tribal Only); Food Distribution Program on Indian Reservations; TANF/California Work Opportunity & Responsibility to Kids (CalWORKs); Federal Veterans and Survivors Pension Benefit Program; Low Income Home Energy Assistance Program (LIHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance or Section 8; CalFresh, Food Stamps, or Supplemental Nutrition Assistance Program (SNAP).

[51] Staff Proposal at 8.

programs for immigrants, Affordable Connectivity Program (ACP), Pell Grant recipients, and families residing in Community Eligibility Provision school districts.[52]

Program-based eligibility has been an important tool in streamlining California LifeLine eligibility determination and fulfilling the Commission's legislative mandate under the Moore Act. California LifeLine does not have the same resources as the various programs administered by the California Health and Human Services Agency (CHHSA). These programs rely on staff within each county social services department to interview and review the documents and questionnaires submitted by applicants. In comparison, California LifeLine cannot leverage staff in each of California's 58 counties to interview applicants, verify documents, and enroll participants — it relies heavily on service providers to enroll participants. Similarly, California LifeLine relies on the TPA to review the eligibility documents of each applicant.

For these reasons, program-based eligibility has been the primary enrollment path for applicants. The Commission has adopted an expansive list of qualifying assistance programs that are eligible for federal and state support and qualifying assistance programs supported only by the California LifeLine Fund.[53] Approximately 89 percent of California LifeLine program enrollments are verified through their participation in other social service programs.

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[52] Consumer Coalition Opening Comments on Staff Proposal at 9; Low-Income Advocates Opening Comments on Staff Proposal at 9.

[53] G.O. 153 § 5.1.5; *see also* D.18-02-006 at 20.

California LifeLine leverages the CHHSA enrollment processes to automatically verify eligibility.

It is important to note that enrollment in any state program that provides cash assistance or general relief is accepted by California LifeLine as proof that an individual qualifies under income eligibility. Thus, many of the programs that parties recommended, such as Cash Assistance for Program for Immigrants (CAPI), California Food Assistance Program (CFAP), Trafficking and Crime Victim Assistance Program (TCVAP), and Refugee Cash Assistance (RCA), qualify the applicant for California LifeLine benefits. These programs are administered by the California Department of Social Services (CDSS) and leverage the efforts of CDSS to review and enroll individuals without SSNs in their programs.

We note that as of March 2025, California LifeLine implemented changes to the existing application intake process by introducing benefit qualifying persons (BQP) as a form of eligibility. This aligns the application intake process of the California LifeLine program with the federal Lifeline program. BQP can be either a minor child or a dependent residing at the same address as the applicant. Currently, most households are eligible for California LifeLine based on the applicant's participation in a qualifying program like SNAP or Medicaid. However, this change enables households with minors or other individuals in the households who have an SSN and meet one of the California LifeLine eligibility requirements to enroll in the program.

Currently, the list of qualifying assistance programs for California LifeLine is updated via Staff resolution. Staff will continue to modify the list of qualifying assistance programs through this process. Accordingly, we modify General Order 153, Section 5.1.5 to reflect that approved qualifying assistance programs eligible for state and/or federal support may be modified through a Staff resolution that is adopted by the Commission. The Staff resolution will also include updates to General Order 153, incorporating the proposed changes and an index of the resolutions and decisions modifying General Order 153.

3.1.6. Income-Based Eligibility

Approximately 11 percent of California LifeLine participants qualify via income-based eligibility. Applicants who use this eligibility pathway must provide documentation that their household income is at or less than 150 percent of the Federal Poverty Limit (FPL), such as the prior year's state, federal, or Tribal tax return, current income statement, or other document listed in General Order 153.[54] The Staff Proposal recommends continuing the current practice for applicants without an SSN.[55] For applicants who claim zero income, Staff proposes a new requirement that applicants provide either bank statements for the past three consecutive calendar months or a notarized affidavit/self-declaration.[56]

Consumer Coalition, CforAT, and Low-Income Advocates argue that requiring three months of bank statements may be problematic for certain

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[54] G.O. 153 § 5.4.1.2.1.

[55] Staff Proposal at 9.

[56] *Ibid*.

eligible Californians, and paying for notary service could be prohibitive.[57] These parties recommend accepting sworn statements from applicants or their employers instead. In contrast, Assurance recommends deleting the self-declaration option to reduce exposure to fraudulent applications.[58]

We are sensitive to the concerns raised by Consumer Coalition, CforAT, and Low-Income Advocates and can see how eligible Californians would struggle to provide bank statements or a notarized affidavit/self-declaration. However, we also share Assurance's concern about fraudulent applications. If we subsidize service providers without verifying that new applicants are eligible, the California LifeLine Fund could be jeopardized.

We, therefore, adopt a modified version of the Staff Proposal's recommendation. Any applicant seeking income-based eligibility, whether with an SSN or without, must provide documentation required by General Order 153, Section 5.4.1.2.1 demonstrating that the applicant's total household income does not exceed the program's income eligibility limits. This is consistent with the documentation requirements of other social services programs.

For an applicant who claims zero income, we decline to adopt the Staff Proposal's recommendation to require a notarized affidavit/self-declaration. The proposal to require a notary provides limited benefits for reducing waste, fraud, and abuse. Moreover, it is appropriate to place the burden of verifying

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[57] Consumer Coalition Opening Comments on Staff Proposal at 7-9; Low-Income Advocates Opening Comments on Staff Proposal at 8-9; *see also* CforAT Reply Comments on Staff Proposal at 3.

[58] Assurance Opening Comments on Staff Proposal at 4.

documentation on the TPA and California LifeLine, not on the applicant who needs assistance.

Finally, in an effort to continuously protect the integrity of the program, Staff will monitor for any abnormal increase in California LifeLine applicants seeking income-based eligibility and claiming zero income. If Staff identifies a significant increase, the Commission will be alerted, and the Commission may require that a service provider pause new enrollments to protect the California LifeLine Fund from waste, fraud, and abuse.

We also note that a trusted partner network, as discussed in Section 3.1.4 above, may help California LifeLine participants verify their income.

3.1.7. Guard Against Waste, Fraud, and Abuse

To ensure that private service providers use public funds for public benefits, the Commission must exercise its power to guard against waste, fraud, and abuse. Below we discuss two relevant proposals for mitigating waste, fraud, and abuse: (1) integrating identification verification software into the TPA intake process; and (2) offering service providers a safe harbor in cases of fraudulent applications.

3.1.7.1. Identity Verification Software Integration

The Staff Proposal recommends accepting limited types of identity documents when the updated application first launches so CSRs can thoroughly, accurately, and quickly process a possible increase in applications.[59] The types of

[59] Staff Proposal at 4. Initially, the Staff Proposal recommends limiting identity documents to (1) foreign passports; (2) consular identification cards; (3) AB 60 driver's licenses; and (4) Mexican federal electoral cards.

acceptable identity documents can significantly expand if the Commission amends its TPA contract to pay for LexisNexis TrueID, according to the Staff Proposal.[60] The Staff Proposal also recommends that the Commission authorize a contract amendment, which would integrate TrueID into the TPA process and allow the TPA additional time to process applications for individuals without an SSN.[61]

In response to the Staff Proposal, multiple parties recommend allowing applicants to opt-out of using TrueID. Low-Income Advocates and CforAT question the practicality of asking applicants, some of whom may be vision impaired or experiencing other disabilities, to use a smartphone or digital device when applying for a low-income phone plan.[62] Low-Income Advocates, Consumer Coalition, and the Small LECs also identify concerns about data privacy.[63]

We appreciate the parties' comments. At the outset, we clarify that the Commission will not use facial recognition practices in its California LifeLine identity verification software.[64]

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[60] *Id*. at 4-5, Attachment A.

[61] *Id*. at 5. The current contract requires the TPA to process applications within three days. The current identity verification software being considered, TrueID, typically allows applicants up to seven days to complete checks.

[62] Low-Income Advocates Opening Comments on Staff Proposal at 5-6; *see also* CforAT Reply Comments on Staff Proposal at 1-2.

[63] Consumer Coalition Opening Comments on Staff Proposal at 5; Small LEC Opening Comments on Staff Proposal at 4-5; *see also* Low-Income Advocates Reply Comments on Staff Proposal at 5.

[64] *See* Low-Income Advocates Opening Comments on Proposed Decision at 13; TURN and GLI Opening Comments on Proposed Decision at 3-4.

We also recognize that the integration of web technologies into the California LifeLine program raises legitimate accessibility concerns. The Commission must address these concerns under the Moore Act's mandate to make high-quality communications services available to the greatest number of Californians and Government Code Section 11546.7. Under Government Code Section 11546.7(a), the Commission must ensure that its public websites comply with the current Web Content Accessibility Guidelines.[65] We also recognize that the identity verification software being considered affords applicants additional time to access and use technology resources than the current process.[66]

Similarly, the Commission must address the parties' privacy and security concerns. Through this decision, we authorize the TPA and service providers to use identity verification software to verify applicants' identity documents. However, this authorization must remain consistent with Californians' constitutional right to privacy and the California Consumer Privacy Act.[67] All California LifeLine applicants, whether they provide an SSN on their application or not, deserve assurance that identity verification software will not infringe upon this right. The TPA and service providers may not use applicants'

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[65] *See* https://www.w3.org/TR/WCAG21.

[66] Staff Proposal at 5. The current contract requires the TPA to process applications within three days. The current identity verification software being considered, TrueID, typically allows applicants up to seven days to complete checks.

[67] Cal. Const., art. I, §1; Civil Code §§ 1798.100, *et seq.*

information for unauthorized purposes as specified by the Commission or applicable state or federal law.[68]

In response to Low-Income Advocates', the Small LECs', TURN, and GLI's concerns regarding the integration of TrueID into the application process,[69] Staff will work with the Commission's Information Technology (IT) Services Division to confirm that any new vendor providing identity verification services to California LifeLine complies with the Commission's privacy policy and the United States General Services Administration's (GSA) Information Technology Security Procedural Guides.[70]

Furthermore, we find it reasonable to adopt TURN and GLI's recommended privacy protections.[71] As such, Staff will ensure that the new identification software does not retain California LifeLine consumers' personal identification information submitted during the application process. This data minimization process will effectively and automatically opt out California LifeLine consumers from having their information sold or shared.

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[68] In comments, some service providers say they rely heavily on SSNs to prevent waste, fraud, and abuse. (*See, e.g.*, TracFone Opening Comments on ACR at 1.) Service providers shall only use applicants' SSNs to cross-reference enrollments and collect the federal subsidy.

[69] *See generally* Low-Income Advocates Opening Comments on Proposed Decision (opposing integration of TrueID into California LifeLine Program); *see also* Small LEC Opening Comments on Proposed Decision at 3; TURN and GLI Reply Comments on Proposed Decision at 1-3.

[70] The Commission's privacy policy is available at cpuc.ca.gov/about-cpuc/privacy-policy. The United States General Services Administration's Information Technology Security Procedural Guides are available at https://www.gsa.gov/policy-regulations/policy/information-technology-policy/it-security-procedural-guides.

[71] TURN and GLI Opening Comments on Proposed Decision at 1-3.

The TPA will integrate identity verification software with the accessibility and data privacy protections described above, and Staff will work closely with the TPA to monitor integration. Staff will also include accessibility and data privacy updates in its updates to the service list.

3.1.7.2. Safe Harbor

Service providers request that the Commission provide them with a safe harbor, so they do not have to reimburse the California LifeLine Fund in situations where an application was deemed fraudulent. Assurance states that unless it has a safe harbor, it cannot provide applicants without an SSN with devices or services through its third-party agents.[72] AT&T also urges the Commission to adopt a safe harbor given the uncertainty in the implementation timeline, the unknown aspects of the Staff Proposal, and concerns that CSRs do not conduct manual reviews accurately.[73] The Staff Proposal recommends denying the request for a safe harbor.[74]

We agree with the Staff Proposal. Offering service providers a safe harbor would undermine a key protection against waste, fraud, and abuse. Service providers must not be relieved of the duty to mitigate fraudulent applications as they enroll applicants in the program. Moreover, this decision does not authorize service providers to enroll California LifeLine applicants who do not provide an SSN through their proprietary user portals. Therefore, there is no

[72] Assurance Opening Comments on Staff Proposal at 3.

[73] AT&T Opening Comments on the Staff Proposal at 3.

[74] Staff Proposal at 5.

need for a safe harbor provision to protect service providers who enroll applicants without an SSN.

3.1.8. Data-Driven Implementation

The Staff Proposal recommends that the TPA collect data to assess the effectiveness of changes to the enrollment process and opportunities for further refinement.[75] The Small LECs also recognize that Staff may need to make adjustments "to correct unintended consequences that may arise during the implementation of the enrollment plan."[76] We agree with these points. Staff will work with the TPA to gather data for 18 months — an entire enrollment and renewal period. The TPA will gather data, including, but not limited to, the points listed in the Staff Proposal, Low-Income Advocates' comments on the Staff Proposal, and TURN and GLI's opening comments on the Proposed Decision.[77]

This will enable Staff to implement a transparent and iterative enrollment process. For this reason, Staff will also make non-confidential data collected by the TPA available by posting it on the Commission's California LifeLine website,[78] so that stakeholders can also assess the effectiveness of changes and opportunities for further refinement. Staff may propose to modify or update the enrollment and renewal process based on the data it receives via Staff resolution

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[75] Staff Proposal at 6.

[76] Small LECs Opening Comments on Staff Proposal at 2.

[77] Staff Proposal at 6; Low-Income Advocates Opening Comments on Staff Proposal at 8; TURN and GLI Opening Comments on Proposed Decision at 6-7.

[78] The website is cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/lifeline.

to the Commission, to the extent that such modifications and updates are consistent with D.14-01-036 and the Moore Act.

3.1.9. General Order 153

This decision revises General Order 153 to reflect modifications authorized in this decision. The revisions to General Order 153 are attached to this decision as Appendix A.

3.2. Subsidizing Federal Support

Because the FCC requires a four-digit SSN to receive the federal subsidy, California LifeLine providers that enroll applicants without SSNs will not receive this subsidy.[79] To address this issue, most parties recommend that the California LifeLine Fund make up for all loss of federal support.[80] Cox, TURN, and GLI assert that LifeLine participants without an SSN are "California-Only Subscribers" because they meet California's program-based eligibility standards.[81] We agree.

California LifeLine has a broad list of qualifying assistance programs, such as the Low-Income Home Energy Assistance Program and the National School Lunch Program, which do not require an SSN. For that reason, California LifeLine applicants who do not provide an SSN will likely also be California-Only Subscribers. General Order 153 allows service providers to

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[79] *See Lifeline and Link Up Reform and Modernization* (Fed. Communications Com. (02/06/2012) 27 FCC Rcd 6656 at 6738, no. 191); *see also* 47 C.F.R. § 54.410(d)(2)(vi).

[80] *See, e.g.,* AT&T Opening Comments on ACR at 3; Low-Income Advocates Opening Comments on ACR at 10-11; NaLA Opening Comments on ACR at 2; TracFone Opening Comments on ACR at 8; *see also* TURN and GLI Reply Comments on Staff Proposal at 2.

[81] Cox Opening comments on ACR at 4-5; TURN and GLI Opening Comments on ACR at 13-14; *see also* G.O. 153 § 5.1.5.4.

collect lost federal support from the California LifeLine Fund for California-Only Subscribers commensurate with the subsidy available to a participant with an SSN and the same service.[82]

Because we envision applicants without an SSN meeting these criteria, the California LifeLine Fund can be used to make up for the lost federal support for participants without an SSN. However, Staff will use the data it receives during the implementation of this process to monitor service providers' claims for the federal makeup and the impact that providing a full federal makeup has on the California LifeLine Fund. This is consistent with D.14-01-036, which states that the Commission "will monitor enrollment in this California-only fund to determine whether any adjustments are warranted."[83]

3.3. Identity Verification

The California LifeLine enrollment process requires service providers and the TPA to verify that applicants are the same individuals who meet program- or income-based eligibility criteria. This guards against waste, fraud, and abuse. However, this can be a challenge for applicants who do not have an SSN because many identity verification documents (*e.g.*, California driver's license, United States passport, *etc.*) require one.

The Staff Proposal recommends addressing this challenge by initially accepting a limited set of identity documents: foreign passports, consular identification cards, AB 60 driver's licenses, and Mexican federal electoral

[82] *See* G.O. 153 § 5.1.5.4.

[83] D.14-01-036 at 123.

cards.[84] According to the Staff Proposal, accepting this limited set initially will enable the TPA's CSRs to review applications manually and adhere to current California LifeLine requirements.[85] However, once the TPA integrates the identity verification software, the TPA will be able to authenticate over four hundred types of government-issued identity cards.[86]

Low-Income Advocates recommends that the Commission broaden the list of acceptable identification beyond government-issued identity cards to account for potential access issues.[87] Both Low-Income Advocates and Consumer Coalition recommend that the Commission align the California LifeLine verification process with programs that have greater success in reaching low-income communities, such as Medi-Cal, Women Infants and Children Program (WIC), and the lapsed ACP.[88]

While California LifeLine differs from Medi-Cal and WIC because the Commission generally relies heavily on private telecommunications companies to increase enrollment, here we do not authorize private telecommunications companies to enroll applicants without an SSN through their proprietary platforms. As such, we authorize Staff to accept all forms of identity documents that the identity verification vendor can validate, as long as the Commission's IT

[84] Staff Proposal at 4.

[85] *Id*. at 3-4.

[86] *Id*. at 4-5, Attachment A.

[87] Low-Income Advocates Opening Comments on ACR at 11-13; *see also* Low-Income Advocates Opening Comments on Staff Proposal at 4-5.

[88] Consumer Coalition Opening Comments on Staff Proposal at 4; Low-Income Advocates Opening Comments on Staff Proposal at 5.

Services Division first confirms that the identity verification software vendor complies with the criteria described above in Section 3.1.7.1.

4. Summary of Public Comment

Rule 1.18 of the Commission's Rules of Practice and Procedure (Rules) allows any member of the public to submit a written comment in any Commission proceeding using the "Public Comment" tab of the online Docket Card for that proceeding on the Commission's website. Rule 1.18(b) requires that relevant written comments submitted in a proceeding be summarized in the final decision issued in that proceeding. The Commission received six public comments relevant to this decision.

One commenter references a letter submitted to the Public Advisor from Oakland Privacy, ACLU CA Action, California Immigrant Policy Center, Privacy Rights Clearinghouse, and Media Alliance Summary to request that the Commission not contract with TrueID. In addition, comments on behalf of the Healing and Justice Center and UNITE-LA strongly support implementing an enrollment pathway for applicants to California LifeLine without an SSN. According to the Healing and Justice Center and UNITE-LA, immigrants, domestic violence survivors, and those facing housing insecurity face significant barriers to essential resources and communication, making affordable phone service a critical lifeline for their safety, security, and access to opportunities. The Commission also received three public comments opposing this decision.

5. Conclusion

The Commission will implement D.14-01-036, so eligible Californians without an SSN may apply to California LifeLine. Because Californians without an SSN will likely qualify as California Only Subscribers, the California LifeLine Fund shall make up for lost federal support consistent with General Order 153 moving forward. Californians without an SSN shall present documentation to verify their identity at the time of the application.

6. Comments on Proposed Decision

The proposed decision of President Alice Reynolds in this matter was mailed to the parties according to Public Utilities Code Section 311 and comments were allowed under Rule 14.3. Comments were filed on August 12, 2024, and reply comments were filed on August 19, 2024, by Assurance, AT&T, CforAT, Cox, Low-Income Advocates, NaLA, the Small LECs, TracFone, and TURN and GLI.

7. Assignment of Proceeding

President Alice Reynolds is the assigned Commissioner and Robyn Purchia is the assigned ALJ in this proceeding.

Findings of Fact

1. In 2012, the FCC revised the federal Lifeline program to require applicants to provide the last four digits of their SSN.
2. Some Californians who may qualify for California LifeLine do not have SSNs or access to their SSNs.
3. The Moore Act mandates that the Commission make communications services at affordable rates available to the greatest number of California residents.
4. D.14-01-036 extended eligibility to participate in the California LifeLine program to eligible Californians without an SSN, and only required that eligible Californians provide government-issued identification.

5. D.14-01-036 does not remove the existing pathway for Californians with an SSN to provide their last four digits to enroll in the program. California LifeLine applicants who provide their SSN comply with the FCC requirement and qualify for the federal subsidy, which amounts to a total of approximately $100 million to $150 million to California participants annually.

6. General Order 153 allows service providers to collect lost federal support from the California LifeLine Fund for "California-Only Subscribers."

7. The Commission filed a waiver petition with the FCC in February 2015 to enable California participants who do not provide their SSN to receive the federal subsidy. The waiver petition is still pending.

8. The Commission operates California LifeLine through a TPA with funds collected through a surcharge on all telecommunications lines in California.

9. The California LifeLine Call Center helps applicants sign up for California LifeLine and is available from 7:00 a.m. to 7:00 p.m. Pacific Time, Monday to Friday, excluding state holidays.

10. Most California LifeLine participants enroll through "Street Teams," which work for individual service providers. Street Teams conduct in-person outreach and enrollment in areas more likely to have eligible participants.

11. The Commission has various methods to guard against waste, fraud, and abuse.

12. The requirement that service providers reimburse California LifeLine for any subsidies related to fraudulent applications and the integration of applicant identity verification software are two methods to address waste, fraud, and abuse.

13. Californians may qualify for California LifeLine through either program-based eligibility or income-based eligibility.

14. Program-based eligibility allows individuals to qualify for California LifeLine discounts if one or more people in their household are enrolled in certain assistance programs. This eligibility pathway is an important tool to streamline California LifeLine eligibility determinations and fulfill the Commission's legislative mandate under the Moore Act. Of all California LifeLine enrollments, 89 percent are verified via program-based eligibility.

15. When California LifeLine applicants provide their SSNs, California LifeLine uses the SSN to cross-check applicants' participation in other social service programs, such as CalFresh, to automatically verify eligibility.

16. Income-based eligibility applies to Californians who can prove that their household income is at or less than 150 percent of the FPL. Applicants who use this eligibility pathway must provide documentation. Of all California LifeLine enrollments, 11 percent are verified via income-based eligibility.

17. California LifeLine participants must renew their eligibility annually. Analyzing data over 18 months allows Staff to capture a full cycle of enrollments and renewals.

Conclusions of Law

1. The California LifeLine application process should be updated to comply with D.14-01-036 and allow for two enrollment pathways for eligible Californians without an SSN and eligible Californians who have an SSN.

2. Staff should work with the TPA to integrate identity verification software into the intake process as quickly as possible.

3. Staff should amend the contract with the TPA to include all changes to the application, enrollment, and implementation of identity software.

4. Service providers should follow the directions and comply with deadlines provided by Staff for the implementation.

5. For Californians who do not provide an SSN, service providers that participate in California LifeLine should refer enrollment to the California LifeLine program direct enrollment processes.

6. Staff should have the discretion to modify and update the verbiage in the California LifeLine application to respond to eligible Californians' needs, comply with state and federal requirements, and guard against waste, fraud, and abuse.

7. Contracting with a software technology service to verify a diverse array of identification documents balances the Commission's duties to make California LifeLine services accessible and guard against waste, fraud, and abuse.

8. The integration of web technologies into social services raises legitimate accessibility, privacy, and security concerns. The Commission should address these concerns under the Moore Act's mandate to make high-quality communications services available to the greatest number of Californians, Government Code Section 11546.7, and the California Consumer Privacy Act.

9. All California LifeLine applicants, whether they provide an SSN on their application or not, deserve assurance that identity verification software will not infringe upon their right to privacy.

10. Staff should work with the Commission's IT Services Division to confirm that any future vendor used to provide identity verification services to California

LifeLine complies with the Commission's privacy policy and the GSA Information Technology Security Procedural Guides.

11. The California LifeLine TPA and service providers should not use California LifeLine consumers' information for unauthorized purposes as specified by the Commission or applicable state or federal law. This requirement extends to any third-party that the California LifeLine TPA or service provider contracts with regarding California LifeLine.

12. It is reasonable to require that any identification verification vendor not retain California LifeLine consumers' personal identification information submitted during the application process. This data minimization process will effectively and automatically opt out California LifeLine consumers from having their information sold or shared.

13. California LifeLine applicants should have program enrollment assistance that supplements what the TPA and service providers offer.

14. Staff should have the discretion to update the list of approved qualifying assistance programs eligible for state and/or federal support through the California LifeLine Fund via Staff resolution to the Commission.

15. All applicants seeking income-based eligibility, whether with an SSN or without, should provide documentation required by General Order 153, Section 5.4.1.2.1 demonstrating that the applicant's total household income does not exceed the program's income limits.

16. To ensure service providers use the subsidies the Commission provides from the surcharge for the intended public purpose, the Commission should guard against waste, fraud, and abuse.

17. The California LifeLine enrollment process should be transparent and iterative to California LifeLine applicants' needs.

18. Staff should make non-confidential data collected by the TPA available to the public by posting it on the Commission's California LifeLine website, so stakeholders can assess the effectiveness of changes to the California LifeLine application process and allow opportunities for further refinement.

19. Staff should have discretion to modify or update the California LifeLine enrollment and renewal processes based on the data it receives through the implementation of this decision via Staff resolution to the Commission, to the extent such modifications and updates are consistent with D.14-01-036 and the Moore Act.

20. The Commission should consider adjustments to the federal makeup for California-Only subscribers if warranted.

21. The Commission should modify General Order 153 to reflect changes to the application, program-based eligibility, and other minor modifications.

O R D E R

IT IS ORDERED that:

1. All California LifeLine service providers must comply with the policies, procedures, and rules adopted in this decision.

2. The Commission's Communications Division staff will update the California LifeLine program consistent with Decision 14-01-036, and as detailed in this decision, including a) updating the California LifeLine application to provide for a dual enrollment pathway, b) amending the Third-Party Administrator contract to add the necessary funds required to correspond with

all updated processes and software implementation, c) providing updates to the proceeding's service list on status, d) working with the Third-Party Administrator to integrate an identity verification software and gather data for further improvements, e) working with the Information Technology Services Division to confirm that identity verification vendors comply with accessibility and privacy requirements, f) developing a proposal for the trusted partner framework, g) updating the list of qualifying assistance programs supported by the California LifeLine Fund, and h) other monitoring efforts for future improvements.

3. The California LifeLine Fund shall be made available to make up for any loss of federal subsidy for those California LifeLine participants who enroll in the California LifeLine program without social security numbers consistent with General Order 153.

4. The revisions to General Order 153 in Appendix A to this decision are adopted.

This order is effective today.

Dated ______________________, at Sacramento, California.

APPENDIX A

Changes to General Order 153

GO 153 Revisions

5.1.5. Program-Based Criterion allows a Customer to enroll in California LifeLine based on participation by the Applicant or a member of the Applicant's Household in a qualifying assistance program. Approved qualifying assistance programs eligible for state and/or federal support may be modified through a staff resolution that is adopted by the Commission.

5.4.2.2. In the Application Form, the Applicant must provide: (a) The Applicant's full name; (b) the Applicant's full Residential address; (c) whether the Residential address is permanent or temporary; (d) the Applicant's billing address, if different from the Residential address; (e) the Applicant's date of birth; (f) if the Applicant can provide a Social Security Number, the Applicant must provide the last four digits of their Social Security Number, or the Applicant's Tribal identification number, if the Applicant is a member of a Tribal Nation and does not have a Social Security Number; and (g) if the Applicant does not have a Social Security Number to provide and is not a member of a Tribal nation, after certifying that they do not have a Social Security Number to provide, the Applicant will be required to provide a form of government-issued identification, as defined by the Commission, to confirm their identity.

5.12.4. The enrollment request freeze shall not be imposed where the California LifeLine Administrator does not have access to the Applicant's name, Residential service address, and date of birth, and last four digits of the social security number, where applicable, or Tribal Identification.