

Attachment 1

CD Staff Proposal



California Public Utilities Commission

R.23.11.001 STAFF PROPOSAL

Communications Division

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1. Executive Summary

The California Connect program, also called the Deaf and Disabled Telecommunications Program (DDTP), is a state-mandated initiative of the California Public Utilities Commission (CPUC or Commission) that provides Californians with hearing, speech, physical, cognitive, visual, and memory disabilities with specialized communications, relay services, and speech assistance programs. The California Connect aims to improve the quality of life and create pathways for independent communication by engaging consumers through community-based partnerships.

On November 2, 2023, the Commission initiated an Order Instituting Rulemaking (OIR) 23.11.001 to "consider the need for revisions and updates to the Deaf and Disabled Telecommunications Program (DDTP)." As a key component of this Rulemaking, the assigned Administrative Law Judge issued a Scoping Memo on April 10, 2024, outlining the critical issues that the OIR will address.

To ensure robust public input in guiding the Commission's resolution of the issues outlined in the Rulemaking, parties submitted written comments to the proceeding. Public Participation Hearings (PPHs) were held in 2024, with additional PPHs scheduled in 2025 after issuance of this proposal. The comprehensive feedback gathered from both written submissions and PPHs have been carefully reviewed and will continue to inform the California Connect staff recommendations for modernizing and enhancing the program.

CPUC's Communications Division (CD) reviewed party comments and

issued this proposal which assesses the existence of telecommunication and communication barriers, explores compatible new services and equipment (including software) for smartphone integration, and explores opportunities for coordination with other consumer programs to increase awareness, enrollment, and efficiency. It also considers strategies to enhance education, outreach, partnerships, and training to boost awareness and technical proficiency among users. Additionally, this proposal considers the impact on environmental and social justice communities, as well as the role of the California Connect program in supporting emergency responses. CD analyzed key areas of the California Connect program and provided the recommendations below for improvement.

Modernization of Disability Certification

The current California Connect disability certification process requires verification from medical professionals, creating barriers to program participation. To complete their application, individuals must obtain a physical signature from a licensed provider, often necessitating doctor's appointments, upfront payments, transportation expenses, and, in some cases, coordinating specialized medical transport. These requirements create substantial barriers to access and discourage eligible individuals from participating in the program.

CD recommends the removal of the medical professional requirement and allow CD Staff to develop the eligibility criteria for participants to obtain California Connect equipment and services. The removal of the medical professional certification requirement may necessitate updates to Public Utilities Code Section 2881.

Enhancing Services, Equipment, and Emergency Response Integration

To modernize the California Connect program, CD proposes offering IP-enabled and wireless communication devices and services in addition to landline-based equipment and services. The Equipment Distribution Program (EDP) component of California Connect already offers several assistive technologies and accessories compatible with mobile phones, including cell

phone amplifiers. CD recommends providing primary IP-enabled and wireless communication devices, including tablets, telephones, smartphones, and mobile Wi-Fi devices. IP and wireless-based services include customer assessment of IP and wireless communication needs, installation, and technical support of IP and wireless equipment and services. These services can be provided in person, remotely, or virtually. Emergency response efforts should be strengthened through partnerships with disaster relief agencies, ensuring California Connect services and equipment are available in evacuation centers during emergencies.

Continued Streamlining Program Enrollment, Accessibility, and Brand Recognition

The California Connect program encompasses multiple programs, including the Equipment Distribution Program, which provides telecommunication equipment, Voice Options, and offers tablets with speech apps, Speech Generation Devices, specialized speech

devices and four different types of relay services: Traditional Relay Services, Speech-to-Speech, Caption Telephone Services, and Remote Conference Captioning. CD recommends consolidating all subprograms under the unified “California Connect” brand and implementing a simplified, single-application process. These changes will improve accessibility, reduce confusion, and enhance program visibility.

Expanding Program Alignment and Community Outreach

To increase the program's reach and effectiveness, CD recommends expanding partnerships with state, federal, and local community entities that provide social services, independent living, developmental, academic, and housing resources to support persons with disabilities. Outreach entities include income-based assistance programs, such as financial assistance, healthcare, food, and transportation programs, ensuring that eligible individuals also receive telecommunication and communication support they need from California Connect. Collaboration with community-based organizations (CBOs) will improve the program's visibility, particularly in underserved, rural, and unserved tribal communities. CD recommends issuing strategic grants to CBOs to assist in outreach and the distribution of California Connect equipment to the consumers they directly serve.

Governance and Data-Driven Program Improvements

CD recommends updating the DDTP Advisory Committee charters to meet evolving program needs. Charter updates include updating references to regulations, including communication equipment and services, changing terminologies, and expanding the area of disability representation for new member seats on both the Equipment Program Advisory Committee and the Telecommunications Access for the Deaf and Disabled Administrative Committee.

The recommendations outlined in this report aim to modernize California Connect, enhance accessibility, and strengthen program governance. The proposed recommendations primarily involve transitioning to updated equipment and services that will streamline operations while maintaining fiscal responsibility. By implementing these changes, the program can better serve individuals with disabilities, ensuring they have access to essential communication services that meet their diverse needs.

2. Eligibility and Background Considerations

This section provides an overview of the program's eligibility criteria, historical background, and key stakeholder perspectives.

2.1. Eligibility

Eligibility to receive specialized communications equipment and services from the California Connect program includes the following criteria:

1. Applicant must reside in the State of California.
2. Applicant must be certified as having one or more disabilities: hearing, vision, mobility, speech, and cognitive.

California Connect meets the demand of the number of consumers applying for services and equipment. As such, the Commission does not currently consider a means test necessary to control program costs.

2.2. Equipment Distribution and Services

In 1979, the California Legislature enacted Public Utilities (Pub. Util.) Code Section 2881 et seq, which codified an existing CPUC program for persons who are deaf and disabled. Pub. Util. Code Section 2881 required that the Commission design and implement a program to provide telecommunication devices to deaf and hard-of-hearing individuals.

Subsequent legislation augmented Section 2881's requirements, expanding the program's scope to provide a dual-party relay system, specialized telecommunications equipment to other disability groups, and funding for

speech-generating devices. The program is referred to as the Deaf and Disabled Telecommunications Program (DDTP) in the Public Utility Code and under the brand consolidation is marketed as California Connect. The following legislative mandates presently govern the program:

- Section 2881(a) authorizes the provision of Teletypewriters (TTYs) to deaf or hard-of-hearing individuals.
- Section 2881(b) uses third-party intervention to connect telephone consumers who are deaf, hard-of-hearing, or speech-impaired with other parties.
- Section 2881(c) authorizes providing other specialized telecommunications equipment to consumers with hearing, vision, mobility, speech, or cognitive disabilities.
- Sections 2881(d) and 2881(e)(1) authorize the provision of speech-generating devices as the provider of last resort and add speech-language pathologists as a DDTP certifying agent.

There are three components in the California Connect program: 1) the Equipment Distribution Program (EDP), which provides specialized communications equipment and services; 2) the California Relay Service (CRS), which is a dual-party relay system; and 3) the Augmentative and Alternative Communications (AAC) program, which provides speech generating devices.

The EDP, CRS, and AAC programs address Pub. Util. Code Sections 2881(a) and (c), 2881(b), and 2881(d) and (e)(1), respectively.

2.2.1. Equipment Distribution Program (EDP)

The EDP provides specialized communications equipment and services at no cost to individuals with disabilities. Examples of devices offered through the EDP include specialized phones for people who are hard of hearing, cordless speakerphones for those with mobility difficulties, and picture phones for persons with cognitive disabilities. A comprehensive list of EDP's available equipment can be accessed online.²

Many phones available through the EDP are landline-based; however, the EDP offers several accessories compatible with mobile phones, including cell phone amplifiers.

The EDP supplies equipment and offers customer services such as installation, training, and troubleshooting. There are three ways EDP users

can obtain device assistance:

1) calling the Contact Center, 2) visiting the 14 California Connect Service Centers, and 3) reaching out to a Field Advisor.

For instance, a person with low vision using a phone with enlarged buttons, where the talking keypad abruptly becomes disabled, has three options to receive assistance in resolving the problem. One option would be to call the Contact Center to have an agent walk the individual through the troubleshooting process. Another alternative is stopping by a Service Center to have a representative provide support or replace the device on the spot. Finally, if the individual needs someone to help fix the phone, perhaps due to the severity of the person's vision or not having any family members or friends who can assist, a Field Advisor would be dispatched to the individual's home. Field Advisors are trained to diagnose

² <https://caconnect.org/equipment-services/>

equipment problems and make necessary repairs. As with a Service Center visit, a replacement will be provided if the Field Advisor cannot fix the device.

2.2.2. California Relay Service (CRS)

CRS is a service where a trained third-party operator relays a call from a person with a disability to the individual or entity they are calling. To access CRS, consumers dial 711 from their phone to be connected to a communication assistant, who then makes the call to the person they are calling.

California Relay Services includes three service types: 1) Traditional Relay Service (TRS), which enables an individual who is deaf or hard of hearing to place and receive phone calls using a Teletypewriter (TTY)/Text Telephone Device (TDD), TRS relay utilizes a three way call to include a communication assistants which types and voices what the other caller is conveying; 2) Captioned Telephone Service (CTS), utilizes a specialized caption telephone with a screen displaying text in which a communications assistant types what the other party is saying, and a screen attached to the telephone displays the text for the caller to see and the caller utilized their own voice for the other caller to hear; and 3) Speech-to-Speech (STS), provides the speech caller with a communication assistant in a three way call to revoice what the caller says to the other person on the telephone call.

2.2.3. Speech Generating Devices (SGD)

Assembly Bill 136 (Beall, 2011, Ch. 404) modified Pub. Util. Code

Section 2881 by adding the speech-language pathologists (SLP) as an authorized California Connect Certifying Agent. It directed the CPUC to be the provider of last resort for SGDs. As the provider of last resort, applicants requesting funding from California Connect for coverage of an SGD and/or any associated accessories, mounting systems, and telecommunications components must first demonstrate that they have exhausted all public and/or private insurance sources available to them. For instance, if an individual with a speech disability has Kaiser as their only insurer, whose policy will cover 50% of the cost of an SLP-recommended SGD, the individual can apply to California Connect to cover the remaining 50% copay.

2.3. Stakeholder Perspectives

2.3.1. Stakeholder Input and Regulatory Considerations

Six parties submitted comments to the Order Instituting Rulemaking.

Two parties were telecommunications carriers.³ The remaining four parties were consumer advocacy groups⁴.

The carriers' main concerns centered on whether the Commission has the authority to regulate Voice over Internet Protocol (VoIP) and whether the sunset of Section 710 justifies the imposition of public utility regulations on VoIP services. Telecommunications carriers AT&T and Small LECs asserted that these issues should be explored further and clarified in the rulemaking process. TURN and CforAT disputed the carriers' claims that the Commission does not have regulatory authority over VoIP.⁵ As stated in the Needs Assessment Report, California Connect customers are unable to transition from landline equipment and services to IP and wireless equipment and services because the California Connect program currently does not offer devices such as smartphones, specialized phones for blind and deaf/blind individuals, and tablets with cellular service to utilize speech, video, and auditory apps for placing and receiving calls.

Consumer advocacy groups' comments were more varied. TURN and

CforAT suggested that the DDTP certification of disability eligibility requirements be expanded beyond those provided by medical professionals. They recommended, "that the Commission allow PWDBEs [people with disabilities-owned business enterprises] seeking certification to, like their other DBE [diverse business enterprises] counterparts, submit statements from

³ AT&T, Foresthill Telephone Co., Ducor Telephone Company, The Ponderosa Telephone Co., Volcano Telephone Company, Winterhaven Telephone Company, Calaveras Telephone Company, Hornitos Telephone Company, Sierra Telephone Company, Inc., Happy Valley Telephone Company, The Siskiyou Telephone Company, Kerman Telephone Co., Cal-Ore Telephone Co., and Pinnacles Telephone Co.

⁴ The Public Advocates Office (Cal Advocates); California Coalition of Agencies Serving the Deaf and Hard-of-Hearing; National Diversity Coalition; and The Utility Reform Network (TURN) and the Center for Accessible Technology (CforAT)

⁵ Reply Comments of The Utility Reform Network and Center for Accessible Technology on The Commission's Order Instituting Rulemaking: Rulemaking 23-11-001, 01/22/2024; page 1.

community contacts: community organizations, Tribal Chairpersons, or personal references." They also recommend that the Commission allow similar documentation to serve as proof of eligibility for customer participation in California Connect.

Most consumer advocacy groups, such as TURN and CforAT, and the California Coalition of Agencies Serving the Deaf and Hard of Hearing, stated that the California Connect program's current equipment selection is primarily landline-based, while offering a limited selection of assistive technologies and accessories to connect to consumers' primary communication devices, including phones and smartphones.

TURN, CforAT, the California Coalition of Agencies Serving the Deaf and Hard of Hearing, and Cal Advocates underscored the need to partner with other federal and state assistance programs and community-based organizations to maximize access to and awareness of California Connect. TURN and CforAT, the California Coalition of Agencies Serving the Deaf and Hard of Hearing, and Cal Advocates recommended that California Connect increase its statewide presence, play a more significant role during emergency evacuations, and coordinate with evacuation centers and the California Office of Emergency Services (CalOES) whenever possible.

The California Coalition of Agencies Serving the Deaf and Hard of Hearing suggested that vouchers be considered as a means to obtain

California Connect equipment.⁶ TURN and CforAT, on the other hand, recommended that the CPUC reject the voucher concept or proceed cautiously.⁷

2.3.2. Staff Analysis and Recommendations

CD recommends expanding the list of equipment and IP/wireless-based services to include smartphones, tablets, specialized cellular telephones, and mobile Wi-Fi devices. This should involve providing an individualized selection of assistive technologies and accessories

⁶ California Coalition of Agencies Serving The Deaf And Hard Of Hearing; January 9, 2024; page 3.

⁷ Reply Comments of The Utility Reform Network and Center for Accessible Technology on The Commission's Order Instituting Rulemaking: Rulemaking 23-11-001, 01/22/2024; page 4.

to meet their individual needs, such as braille readers, smart devices,

Bluetooth-supported devices, and HomePods.

2.4. Modernization of Disability Certification

Pub. Util. Code Section 2881 requires individuals with disabilities seeking equipment and services first to be evaluated by a licensed medical professional, such as a physician, audiologist, optometrist, or a representative from a qualifying federal or State agency. This professional or agency staff must then sign the application—physically or electronically—to certify the applicant's disability.

As noted in the California Connect Needs Assessment Report (Needs Assessment Report) and included in Appendix A of Rulemaking 23-11-001, this medical certification requirement is burdensome for prospective eligible applicants. The Needs Assessment Report consists of a participant's account of how the financial burdens of transportation to and from the medical professional's office prevented her from obtaining the necessary certification.⁸

Although the certification requirement by a medical professional cannot be eliminated under the current code, CD recommends pursuing two options to make California Connect more accessible. The first option would be for the

CPUC to develop guidelines for which entities shall be considered a "Qualified Entity" as it relates to providing documentation verifying disabilities. For example, Speech Language Pathologists (SLPs) and other public and private entities each have respective disability verification procedures.

Second, Section 2881 should be amended to allow the acceptance of alternative documents, which could include disability certifications from local, state, or federal assistance programs (e.g., Department of Rehabilitation or Supplemental Security Income), an approved application for the Medical Baseline program, or a transportation pass with a disability certified by the City or County.

⁸ Needs Assessment Report; 2019; page 9.

2.5. Enhancing DDTP Services, Equipment, and Emergency Support

2.5.1. Technology Upgrades

As highlighted in the Needs Assessment Report, "the program has not evolved with the times and relies on outdated technologies that do not address the growing needs of the deaf and disabled community."⁹ In alignment with this, Cal Advocates and the California Coalition of Agencies Serving the Deaf and Hard-of-Hearing emphasize in their comments that "[t]he Commission should modify the DDTP's scope to reflect technological progress, including new types of communications services, such as wireless devices and voice over internet protocol (VoIP) services..." and further recommend expanding, "DDTP equipment to include IP-enabled devices and services, including smartphones.^{10,11} Other states, like Colorado, offer IP-enabled devices in their programs.¹² Additionally, the growing number of households with cell phones substantiates the need to update California Connect equipment and service offerings.¹³

In response to these concerns, CD recommends continuing to work with the Equipment Program Advisory Committee (EPAC) to identify and test

non-landline-based equipment and services, as well as with the Telecommunications Access for the Deaf and Disabled Administrative Committee (TADDAC) to evaluate the adoption of equipment and services into the program.

⁹ Needs Assessment Report Page 4

¹⁰ Opening Comments of The Public Advocates Office on The Administrative Law Judge's Rulemaking to Consider Revisions and Updates to The Deaf and Disabled Telecommunications Program: Rulemaking 23-11-001, 01/09/2024, page 2.

¹¹ Comments of California Coalition of Agencies Serving the Deaf And Hard Of Hearing: Rulemaking 23-11-001, 01/09/2024, page 3.

¹² TEDPA, <https://www.tedpa.com/state-programs>

¹³ Data source from the American Housing Survey through the United States Census Bureau, October 23, 2024. Retrieved from <https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html>. Accessed on February 24, 2025.

California Connect contractor staff have recently introduced IP-enabled wireless devices, emergency equipment, backup batteries, and service offerings from other states to the EPAC to broaden the scope of the California Connect provided devices and services. The newly introduced devices include backup power devices, disaster, weather, and emergency alert devices, as well as home pods and a home alert system that connect using Bluetooth or directly to a smart device. CD and California Connect contractor staff have been involved in this process. They will continue to recommend new and emerging communication devices and accessories, and IP and wireless base services, including video remote interpreting, and Real Time Text (RTT) for EPAC's review. Once EPAC reviews the proposed equipment, services, and assistive technologies, it will determine their potential benefits for people with disabilities and, if deemed appropriate, will forward its recommendations to TADDAC for approval.

2.5.2. Optimizing Procurement and Distribution

An essential component of modernizing California Connect is improving equipment, service procurement, and distribution processes. Currently, the State of California follows standard procurement procedures to purchase equipment, devices, and accessories, which are then stored in the program's

warehouse. When consumers request specific equipment, their choices are limited to what is available in the warehouse, restricting the program's ability to meet their communication needs. This model has led to many potential program participants being turned away because their required equipment is unavailable in the warehouse inventory. As the program is currently structured, devices cannot be procured based on the unique communication needs of individuals with disabilities.

CD recommends an alternative model – direct procurement and shipping – to address these limitations. Direct procurement and shipping are found to be more individualized and effective than the inventory-based shipping structure, which is the

program's current approach.¹⁴ Adopting the direct procurement and shipping model would eliminate warehouse storage costs, allowing consumers to receive their equipment more quickly.

CD also considered the option of distribution of vouchers, as recommended by the California Coalition of Agencies Serving the Deaf and Hard of Hearing. The suggestion is for the Commission to "offer consumers the option of vouchers for equipment, accessories, and services."¹⁵ Under a voucher system, the California Connect would list eligible devices, and individuals with disabilities could apply for vouchers to purchase the necessary equipment or services. Other states are already implementing this concept, as shown in Chart 1 below. According to preliminary research, 17% and 12% of other state EDPs have adopted ownership and voucher models, respectively.¹⁶ In the ownership model, devices are provided directly to participants and become their property, eliminating the need to maintain inventory. In contrast, the voucher model offers consumers a coupon to purchase full or partial equipment.

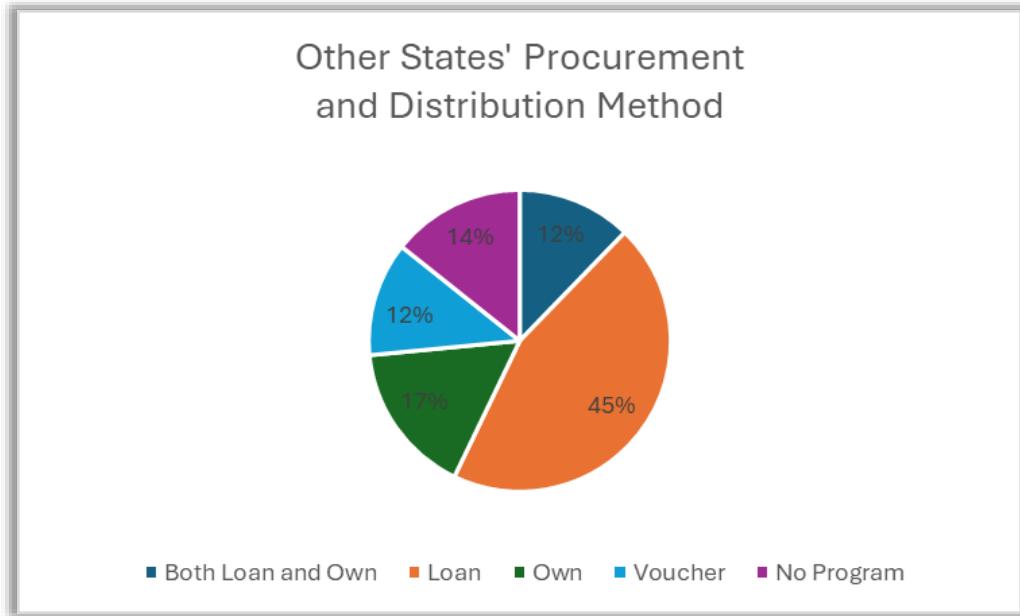
As shown in Chart 1, other states employ a range of methods to procure and distribute equipment: 45% rely on a loan-based model, 12% use a combination of loan and own, 17% provide vouchers, 12% follow an ownership

model, and 14% have no program in place. This variation highlights opportunities for California to optimize its procurement and distribution systems as part of modernizing California Connect. By evaluating best practices from other states, California can improve how equipment and services are sourced and delivered, ensuring greater efficiency, flexibility, and user-centered support across the program.

¹⁴ Gallego, G., & Simchi-Levi, D. (1990). On the effectiveness of direct shipping strategy for the one-warehouse multi-retailer R-systems. *Management Science*, 36(2), 240-243.

¹⁵ Comments of California Coalition of Agencies Serving the Deaf And Hard Of Hearing: Rulemaking 23-11-001, 01/09/2024, page 3.

¹⁶ <https://www.tedpa.com/state-programs>

Chart 1: Procurement and Distribution Methods in Other States

While the voucher model offers flexibility, it raises concerns about potential waste, fraud, and abuse, as pointed out by TURN and CforAT, who warned that "providers can abuse 'couponized' or 'voucherized' safety net programs by, for example, selling customers equipment or services at prices higher than the subsidized amount, making them unaffordable to those customers or inflating prices to maximize the subsidy."¹⁷ Based on these insights, CD recommends adopting the procurement and direct-ship model, which will provide a more personalized and efficient approach to customers. CD does not recommend pursuing a voucher model at this time because it

would introduce significant challenges in cost management, resource allocation, and oversight, potentially increasing the risk of waste and fraud.

¹⁷ Reply Comments of The Utility Reform Network and Center for Accessible Technology on The Commission's Order Instituting Rulemaking: Rulmaking 23-11-001, 01/22/2024; page 5.

2.5.3. Emergency Response Integration

Persons with disabilities face disproportionate impacts from disasters compared to non-disabled people. For a month following a disaster, individuals with hearing or vision disabilities face greater rates of unsanitary conditions, isolation, scam calls, and remain displaced by the disaster than people without a disability.¹⁸

Table 1: Disaster Impacts on Californians with Hearing or Vision Disability¹⁹

Impact after one month	Total Impacted	Total Population Surveyed	Percent Affected
Unsanitary Conditions	235,940	418,639	56.4%
Hearing or Vision Disability	158,492	182,851	86.7%
No Disability	77,448	235,788	32.8%
Displaced for <1 Month	181,515	418,639	43.4%
Hearing or Vision Disability	135,183	182,851	73.9%
No Disability	46,332	235,788	19.6%
Displaced for >1 Month	157,793	418,639	37.7%
Hearing or Vision Disability	19,273	182,851	10.5%
No Disability	138,520	235,788	58.7%
Experienced Isolation	297,720	418,639	71.1%
Hearing or Vision Disability	177,280	182,851	97.0%
No Disability	120,446	235,788	51.1%
Experienced Possible Scam Offer	288,887	418,639	69.0%
Hearing or Vision Disability	177,280	182,851	97.0%
No Disability	111,607	235,788	47.3%

With sufficient resources, California Connect can support people with disabilities during a natural disaster or an emergency evacuation in several ways, including providing outreach, training, and essential services. These efforts include deploying California Connect contractor staff to evacuation centers or temporary shelters to

supply, set up, and train individuals using specialized devices and offering referrals to other needed services. For example, in the aftermath of wildfires, California Connect contractor staff can assist displaced residents by connecting them with communication devices and services tailored to their needs. If an evacuation center is not near a California Connect service center, Cal Advocates recommends forming and deploying mobile service centers (mobile

¹⁸ Response of the Public Advocates Office on the Administrative Law Judge's Rulemaking to Consider Revisions and Updates to the DDTP: Rulemaking 23-11-001 10/11/2024, page 2.

¹⁹ Response of the Public Advocates Office on the Administrative Law Judge's Rulemaking to Consider Revisions and Updates to the DDTP: Rulemaking 23-11-001 10/11/2024, page 3, Table 1.

units) to ensure people with disabilities have uninterrupted access to services and equipment during emergencies.²⁰

As shown in Table 1, Californians with hearing or vision disabilities experience disproportionately higher impacts during disasters—97% reported isolation and exposure to scams, and 86.7% faced unsanitary conditions, compared to 32.8% of those without disabilities. These disparities highlight the urgent need to integrate California Connect services into emergency response efforts. By collaborating with disaster relief agencies and deploying mobile service units to shelters and evacuation sites, California Connect contractor staff can ensure that individuals with disabilities have timely access to communication tools, support, and critical information during emergencies.

Beyond providing equipment, California Connect contractor staff can assess the infrastructure of evacuation facilities to determine whether they can support landline, IP, or wireless communication devices. As noted by TURN and CforAT, "the Commission works with the California Foundation for Independent Living Centers' Disability Disaster Access & Resources Program (DDAR) and the California Department of Social Services Functional Assessment Service Team (FAST) to identify what specific DDTP technology

should be

available at emergency evacuation shelters."²¹ One example might be determining if the facility has landline or ethernet jacks. As emphasized by Cal Advocates, "the Commission should encourage DDTP to collaborate with emergency evacuation shelters to ensure they possess landline jacks for specialized communication equipment, such as captioned phones, teletypewriters (TTY), IP-based services, and a network service that can be used with the California Relay Service (CRS)."²²

²⁰ Response of the Public Advocates Office on the Administrative Law Judge's Rulemaking to Consider Revisions and Updates to the DDTP: Rulemaking 23-11-001 10/11/2024; pages 3, 6, 7

²¹ Comments of Center for Accessible Technology and The Utility Reform Network on Administrative Law Judge's Ruling Requesting Additional Information: Rulemaking 23-11-001, 10/11/2024; page 11

However, several challenges limit the California Connect program's ability to provide comprehensive support in these scenarios. One major issue is coordinating efforts with other government agencies, as each disaster presents unique logistics. For example, responding to a flood requires a different approach than responding to an earthquake. Moreover, there is often a lack of awareness among these agencies that California Connect is a resource for evaluation centers staff, case workers or emergency services personnel working in the field who work directly with the individuals to provide them with the needed and specialized resources such communication devise and services for persons with disabilities, as evidenced by the absence of requests for assistance during recent wildfires and natural disasters.

This gap underscores the importance of educating government agencies about the program's capabilities in emergency response. As Cal Advocates states, "service center staff be trained to prepare visitors with disabilities to plan for emergencies and educate visitors about the process to register for alerts and warnings, as explained in the Cal OES Emergency Preparedness Guide."²³

California Connect contractor staff have already begun making strides in providing education, consistent with the California Coalition of Agencies

Serving the Deaf and Hard of Hearing's recommendation that the CPUC engage in "[c]ollaboration with the California Office of Emergency Services."²⁴ On August 08, 2023, CD delivered a presentation to the California Office of Emergency Services (CalOES Access and Functional Statewide Community Advisory Committee. The purpose of the presentation was to inform CalOES' advisory committee of how the California Connect program can help displaced people with

²³ Opening Comments of The Public Advocates Office on The Administrative Law Judge's Rulemaking to Consider Revisions and Updates to The Deaf and Disabled Telecommunications Program: Rulemaking 23-11-001, 01/09/2024, page 4

²⁴ Comments of California Coalition of Agencies Serving the Deaf And Hard Of Hearing: Rulemaking 23-11-001, 01/09/2024, page 4

disabilities at evacuation centers. Similar outreach is ongoing with other government agencies handling natural disasters.

CD and California Connect contractor personnel will coordinate and maintain quarterly meetings with CalOES to provide program updates, demonstrate services and equipment, and deliver training on the use of the evaluation toolkit. These meetings will support CalOES training staff, as well as federal, state, and local emergency management and disaster response teams. Training will focus on conducting assessments to identify the specific needs of individuals with disabilities during evacuations, deploying mobile service centers or units to ensure continuity of services and equipment at evacuation sites, and establishing a comprehensive 24/7 support system through a dedicated call center and field response teams. This collaboration is intended to enhance CalOES' ability to deliver inclusive and effective emergency response services throughout California.

2.6. Streamline Program Enrollment and Accessibility

2.6.1. Program Consolidation and Branding

As the Needs Assessment Report outlines, many potential program participants are unfamiliar with the California Connect program or its

associated branding. Among those aware of the program, confusion often arises due to the fragmented structure of subprograms, distinct brand names, and differing application processes. As noted by TURN and CforAT, "[t]he administration of current DDTP programs is fragmented—for example, the Voice Options Program is administered by the California Department of Rehabilitation, not DDTP itself. Among other issues, this fragmentation makes the application process more confusing, as there are currently three different applications, and the separate programs have separate sets of rules."²⁵

²⁵ Comments of The Utility Reform Network and Center for Accessible Technology on the Commission's Order Instituting Rulemaking: Rulemaking 23-11-001, 01/09/2024, page 11

The National Deaf Center on Postsecondary Outcomes (NDC) California Report (2023) indicates that 51.8% of deaf individuals in California were employed between 2019 and 2023, compared to 69.7% of hearing individuals.²⁶ Similarly, the unemployment rate in 2024 for persons with a disability was 7.5% compared to those without a disability at 3.8%.²⁷ This employment disparity highlights the importance of streamlined access to telecommunication services that support employment and education.

As described above, California Connect currently encompasses several distinct programs, including the Equipment Distribution Program (EDP), California Relay Services (CRS), and the Augmentative and Alternative Communication (AAC) Program. Historically, these programs were either marketed separately or not promoted effectively. For instance, the EDP operated under the California Telephone Access Program (CTAP), while California Phones and CRS were standalone brands with no direct connection to California Connect.

The EDP and AAC programs also have separate application processes and eligibility determinations, further complicating consumer access. Brand and service consolidation includes combining three service applications into one, including incorporating the provider of last resort components into the

application, transitioning fragmented brand programs under the California Connect brand, and integrating the Speech Generation Device (SGD) and Voice Options program into the EDP offerings to consumers.

2.6.2. Simplifying the Application Process

A significant barrier identified in the CBO Questionnaire from the Needs Assessment Report is the complexity of the California Connect application process. The report revealed that approximately one in ten individuals found the program's hardcopy application overwhelming. As one consumer questionnaire respondent noted, "[t]hose who applied for

²⁶ Bloom, C. L., Palmer, J. L., & Winninghoff, J. (2024). Postsecondary Achievement of Deaf People in California: 2019-2023. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. Retrieved from [Postsecondary Achievement of Deaf People in California: 2019-2023](https://www.nationaldc.org/reports/postsecondary-achievement-deaf-people-california-2019-2023)

²⁷ Persons with a disability, labor force characteristics (2024). Bureau of Labor Statistics. Retrieved from <https://www.bls.gov/news.release/pdf/disabl.pdf>.

the program and identified issues with the process felt that completing the application was difficult and required assistance. Some indicated that they did not apply because it was too overwhelming."

In response to this concern, CD has been diligently working to refine and simplify the application process. This includes reducing the verbiage and number of application fields, making it easier for individuals to understand and complete the form. As suggested by Cal Advocates, the California Connect should "[s]implify the application process by requiring only essential information, such as personal information, disability information, income, and household information; shorten text-heavy sections; and correct difficult-to-navigate sections."²⁸

According to the Needs Assessment Report, transportation and certification barriers prevent eligible individuals from completing the application. Moreover, data confirms that the employment gap between disabled and non-disabled individuals narrowed from -35.9 percentage points in 2021 to -34.4 percentage points in 2022. However, the median earnings from work widened from \$-6,825 in 2021 to \$-8,331 in 2022.²⁹ This disparity in economic outcomes is also similar to national trends, especially employment trends, as shown in the table below. Consequently, removing

economic barriers and implementing processes that simplify access to California Connect services are essential.

Table 2: 2024 Annual Labor Statistics by Disability Status and Race/Ethnicity³⁰

Persons with a Disability, Aged 16-64, 2024

²⁸ Reply Comments of The Public Advocates Office on the Administrative Law Judge's Rulemaking to Consider Revisions and Updates to The Deaf and Disabled Telecommunications Program: Rulemaking 23-11-001, 01/22/2024; page 2.

²⁹ Houtenville, A., & Bach, S. (2024). Annual Report on People with Disabilities in America: 2024. Rehabilitation Research and Training Center on Disability Statistics and Demographics (StatsRRTC), Institute on Disability, University of New Hampshire. Retrieved from <https://www.researchondisability.org/sites/default/files/media/2024-03/2024-annual-report-a11y-1.pdf>

1. ³⁰ Disability Employment Statistics, Department of Labor, extracted from Current Population Survey, Bureau of Labor Statistics. Retrieved from <https://www.dol.gov/agencies/odep/research-evaluation/statistics>

Labor Force Statistics	Hispanic	White	Black	Asian	Other
Labor Force Participation Rate	40.8%	43.0%	32.0%	42.3%	38.4%
Employment- Population Ratio	36.9%	39.9%	28.5%	39.0%	34.2%
Unemployment Rate	9.5%	7.1%	10.8%	8.0%	10.8%

Persons without a Disability, Aged 16-64, 2024

Labor Force Statistics	Hispanic	White	Black	Asian	Other
Labor Force Participation Rate	75.6%	79.7%	76.1%	75.5%	74.5%
Employment- Population Ratio	71.9%	77.3%	71.6%	72.9%	70.1%
Unemployment Rate	4.9%	3.0%	5.9%	3.5%	6.0%

Table 2 above shows evident disparities in employment outcomes between individuals with and without disabilities, especially across racial and

ethnic groups. For example, Black individuals with disabilities have an employment-population ratio of just 28.5%, compared to 71.6% for those without disabilities. Unemployment rates are also much higher for disabled individuals across the board.

These disparities reflect broader national trends and reinforce findings from the Needs Assessment Report, which identified transportation and medical certification as significant barriers in the application process. Although the employment gap has narrowed slightly, the earnings gap has widened, indicating that access and equity remain serious concerns.

As of March 2024, the California Connect application process has been further improved with the launch of an online version. Previously, the form was only available in paper format, and applicants would need to physically submit the application to a medical professional for signature and disability certification.

The launch of the online California Connect application directly addresses the challenges and disparities highlighted in Table 2. It allows medical professionals to certify forms electronically, eliminating the need for in-person visits and reducing the burden on applicants. Simplifying the process removes a critical barrier to access, particularly for low-income and historically underserved groups, and is an essential step toward improving equity in transportation access. With the new form, the application can be routed electronically to the medical practitioner, enabling the medical professional to certify via an online signature. This streamlines the application process by allowing the medical practitioner to receive and sign off on the form sooner and relieves the person with a disability from the burden of seeing a medical professional in person.

TURN and CforAT "recommend that the Commission modify the application forms so that all versions ask for the same information."³¹

Although the online application is active, the paper-based form will remain in use temporarily to facilitate a smooth transition from hardcopy to electronic applications. During the transition, applicants can access both forms, but are encouraged to utilize the electronic application.

To further enhance accessibility, CD recommends additional modifications, including consolidating all application versions into a single streamlined form and incorporating helpful resources and assistance tools to guide applicants. CD also proposes including tutorial features with audio and video instructions to assist users in completing the form. CD staff will seek input from the disability community, Telecommunications Access for the

³¹ Comments of Center for Accessible Technology and The Utility Reform Network on Administrative Law Judge's Ruling Requesting Additional Information: Rulemaking 23-11-001, 10/11/2024; page 3

Deaf and Disabled Administrative Committee, the Equipment Program Advisory Committee members, and consumers to finalize these improvements and ensure the application is as user-friendly and accessible as possible.

2.7. Expanding Program Alignment and Community Outreach

2.7.1. Collaboration with Assistance Programs

According to a compendium produced by the Center for Research on Disability, corroborated by the Needs Assessment Report, individuals within the disability community are disproportionately low-income relative to their non-disabled counterparts. Specifically, nearly one-quarter (22.5%) of persons with disabilities in California are living in poverty, in contrast to 10% of those without disabilities.³² People who are deaf receive Supplemental Security Income (SSI) benefits at different rates across the nation.³³ As a result, there is a strong possibility that many individuals with disabilities could benefit from a variety of local, federal, and state assistance programs beyond the California Connect. The California Connect, however, can play a crucial role in raising awareness about those programs and vice versa. Recognizing this opportunity, TURN and CforAT have recommended that "the Commission

conduct education and outreach about potential state and federal financial assistance programs and engage stakeholders in the disability community about how DDTP might assess and determine financial assistance.”³⁴

³² <https://www.researchondisability.org/sites/default/files/media/2024-07/2024-compendium-final.pdf>

³³ Bloom, C. L., Palmer, J. L., & Winninghoff, J. (2024). Postsecondary Achievement of Deaf People in California: 2019-2023. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. Retrieved from https://dashboard.nationaldeafcenter.org/static/media/NDC_California_report.72852e81110540f612c2.pdf.

³⁴ Reply Comments of The Utility Reform Network and Center for Accessible Technology on the Commission’s Order Instituting Rulemaking: Rulemaking 23-11-001, 01/22/2024; page 3.

At the state level, a program that lends itself to a partnership with California Connect is the California LifeLine Program, which the CPUC administers.³⁵ As indicated by TURN and CforAT, "[t]he Commission should explore ways to leverage these other programs—California LifeLine and Medical Baseline—to increase awareness of DDTP."³⁶ The LifeLine program offers reduced phone service rates for eligible low-income families in California. By the end of 2027, California Connect contractor staff aim to expand the use of its online application, social media platforms, and future digital portal to promote dual enrollment, education, and training opportunities for both LifeLine and California Connect subscribers. This initiative will demonstrate how California Connect's communication devices function and how LifeLine can help offset connectivity costs for income-eligible users. Further, LifeLine awareness could be amplified through California Connect's website, social media, service centers, outreach activities, and marketing campaigns.

In addition, by the end of 2027, California Connect contractor staff will enhance cross-promotion of other related programs such as ICanConnect,³⁷ That is based on income and/or disability criteria. This will include incorporating information about those programs during contact center

interactions, initial service evaluations, and the six-month outbound follow-up calls. For example, applicants engaged with their telecommunications service providers could simultaneously be informed about California Connect, particularly if a disability is disclosed during the application process. Disability Community providers throughout the State of California who provide direct disability services could inform these applicants about California Connect and direct them to the program's website or contact center for further information. Additionally, disability-related social service, education, and

³⁵ Comments of The Utility Reform Network and Center for Accessible Technology on the Commission's Order Instituting Rulemaking: Rulemaking 23-11-001, 01/09/2024, page 9

³⁶ Comments of Center for Accessible Technology and The Utility Reform Network on Administrative Law Judge's Ruling Requesting Additional Information: Rulemaking 23-11-001, 10/11/2024; page 9

³⁷ [Homepage - iCanConnect](#)

community programs could feature California Connect details on their homepages with direct links to California Connect.

As shown in Table 3 below, individuals with disabilities continue to experience significant employment disparities when compared to those without disabilities. In 2022, only 44.5% of individuals with disabilities aged 18 to 64 were employed, compared to 79% of those without disabilities. This trend is consistent across specific disability categories. For example, in California, employment for individuals with ambulatory disabilities was just 30.6%, compared to 75.1% for those without. For those with self-care disabilities, the employment rate was only 17.1%, reflecting the steep challenges faced by individuals with higher support needs.

Table 3: 2022 Employment Individuals with and Without Disabilities Ages 18 to 64 in the United States and California³⁸

Employed by Disability Categories (%)						
	Vi sion	N o Vision	Cog nitive	No Cognitiv e	Am bulatory	No Ambulato ry
United States	50.9%	5.7%	39.0%	77.2%	29.5%	77.3%

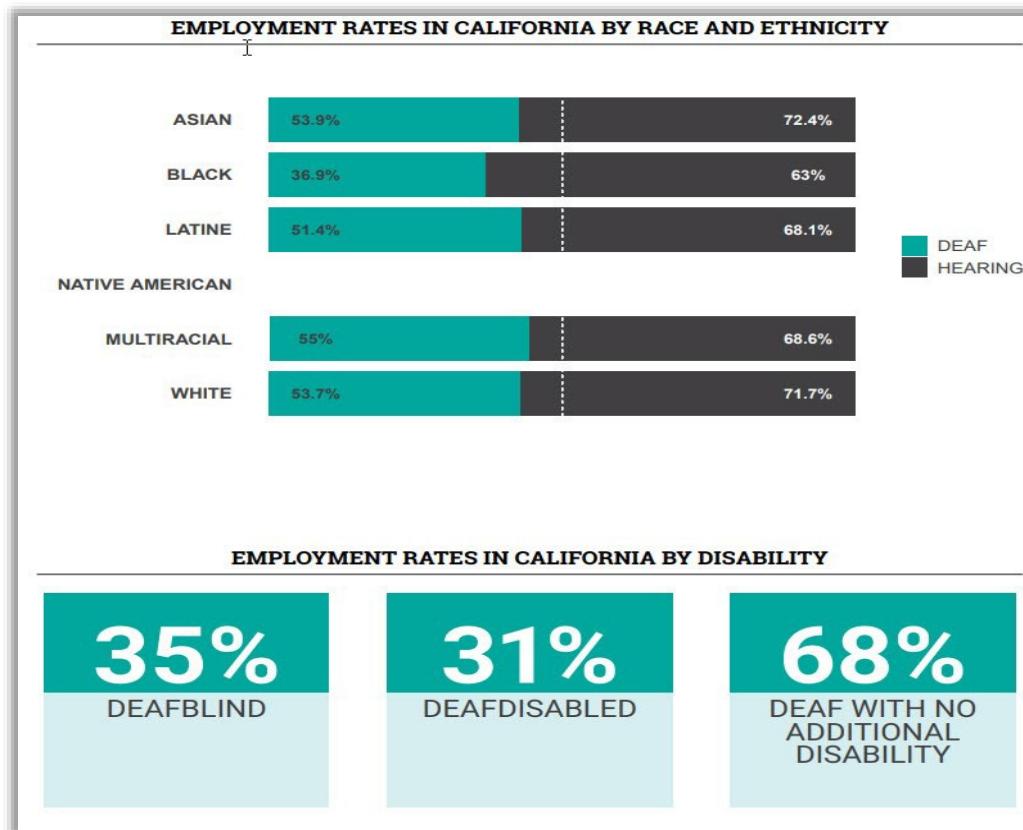
C alifornia	52. 6%	7 4.0%	35.8 %	75.3 %	30. 6%	75.1 %
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Employed by Disability Categories (%)					
	S el f- Care	S o Self - Care	N Independent Living	Inde pendent Living	No Independent Living
U nited States	17. 6%	7 6.1%		23.5 %	77.3 %
C alifornia	17. 1%	7 4.5%		21.6 %	75.4 %

³⁸ Annual Disabilities Statistics Collection: Part of the 2024 Annual Disability Statistics Collection, Center for Research on Disability. Retrieved from <https://www.researchondisability.org/sites/default/files/media/2024-07/2024-compendium-final.pdf>

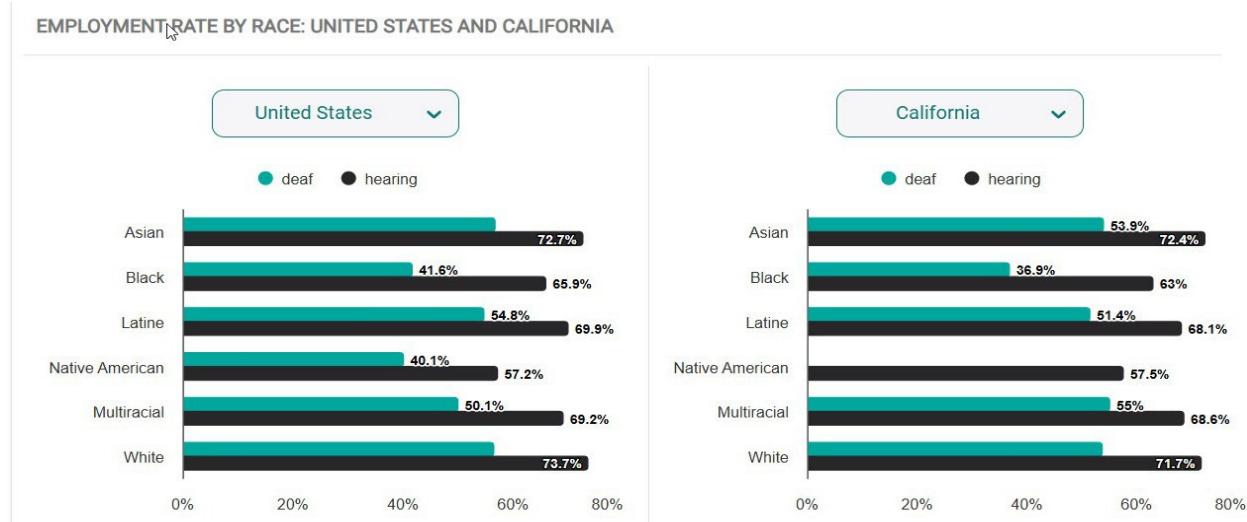
Gaps in educational attainment further compound these disparities. The NDC California Report highlights that only 56.2% of deaf people in California have completed some college, compared to 64.9% of hearing individuals in 2023. Employment rates show a similar gap, with disparities differing across racial groups.³⁹ These patterns highlight the need for coordinated services across programs such as California Connect, California LifeLine, and the Medical Baseline Program. Many individuals with disabilities face overlapping barriers, including limited access to technology, lower educational attainment, and economic hardship, which can prevent them from fully accessing support services.

³⁹ Bloom, C. L., Palmer, J. L., & Winninghoff, J. (2024). Postsecondary Achievement of Deaf People in California: 2019-2023. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. Retrieved from https://dashboard.nationaldeafcenter.org/static/media/NDC_California_report.72852e81110

Table 4: Employment Rates by Race and Ethnicity in California⁴⁰

⁴⁰ Bloom, C. L., Palmer, J. L., & Winninghoff, J. (2024). Postsecondary Achievement of California: 2019-2023. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. Retrieved from

https://dashboard.nationaldeafcenter.org/static/media/NDC_California_report.72852e81110

Table 5: United States versus California Employment by Race⁴¹

Similarly, Tables 4 and 5 show persistent employment disparities in both the U.S. and California when comparing individuals with disabilities to those without, and deaf individuals to hearing individuals, particularly across racial groups. These patterns reinforce the need for greater collaboration among California Connect, California LifeLine, and Medical Baseline to address the compounded barriers faced by underserved communities and ensure more equitable access to employment-supporting services.

The Public Advocates Office also emphasized that individuals with

⁴¹ Bloom, C. L., Palmer, J. L., & Winninghoff, J. (2024). Postsecondary Achievement of Deaf People in California: 2019-2023. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. Retrieved from https://dashboard.nationaldeafcenter.org/static/media/NDC_California_report.72852e81110

disabilities face heightened disaster risks, making it crucial for California Connect to align with emergency preparedness efforts.

CD recommends expanding the program's annual Outreach and Marketing plans to develop partnerships with federal and State income-based public purpose programs, such as CalFresh, SNAP, and Medicaid, as well as other local assistance programs. Through these

⁴² Bloom, C. L., Palmer, J. L., & Winninghoff, J. (2024). Postsecondary Achievement of Deaf People in California: 2019-2023. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. Retrieved from https://dashboard.nationaldeafcenter.org/static/media/NDC_California_report.72852e81110

marketing and outreach collaborations, individuals with disabilities could access a broader support spectrum, ultimately improving their quality of life.

2.7.2. Extending Service Access

In 2024, the California Connect program underwent a significant restructuring of its contractual framework, where the scope of work for a singular contractor was separated, scoped, and bid separately. Previously, a single contractor was responsible for various services, including oversight, field operations, outreach, and equipment testing. However, with the new restructuring, these services were solicited in four discrete Request for Proposals (RFPs) and awarded to winning bidders, allowing for more specialized and focused delivery.

As part of the contract restructuring, all previous California Connect service centers were required to close to enable new leasing arrangements. In the past, the State of California had been the lessee of all the service centers, which was an uncommon practice, as the contractor typically holds leases.

To ensure alignment with State practices, existing leases were not renewed, allowing the new California Connect Field Operations contractor to enter into its service center leases. To minimize the potential for any service

delivery gap, the CPUC issued an RFP to procure a Field Operations contractor in advance of the expiration of the State-held leases. This would permit the Field Operations contractor to start identifying and securing service center spaces such that when the present service centers shut down, replacement ones would launch simultaneously.

The Field Operations contract awardee, Communication Service for the Deaf (CSD), has since opened 14 service centers, including several newly established locations within rural and underserved areas. CD is actively exploring options for adding new full-time and part-time service centers, ensuring that these additions will not impact program resources or costs.

Another strategy for expanding access is partnerships with CBOs,⁴² Enabling California Connect equipment and services offered directly at these locations. As stated by Cal Advocates, "[t]he Commission should increase collaboration with community-based organizations (CBOs) to increase public awareness of DDTP."⁴³

Currently, California Connect operates two service centers in collaboration with Community-Based Organizations (CBOs). However, many CBOs face space constraints, often lacking dedicated areas for California Connect equipment or the capacity for program representatives to conduct assessments. In cases where space is available, compensation for the use of the facility and the time of CBO staff becomes an important consideration.

The National Diversity Coalition "recommend[s] that the CPUC provide resources to community-based groups to promote the DDTP program."⁴⁴ CBOs are already stretched thin with their services. They should not be expected to allocate staff time or physical space without appropriate reimbursement. TURN and CforAT suggest that "the Commission pay CBOs sufficient to add or designate staff to conduct outreach work."⁴⁵

One potential solution to address CBO compensation is the issuance of grants. These grants could provide dedicated funding to CBOs, enabling them

to assist with California Connect outreach, including assessing individuals with disabilities for eligibility, housing eligible devices, administering program surveys, and promoting the program. Concerning surveys, Cal Advocates emphasizes that "[t]o make improvements to DDTP periodically, the

⁴² Reply Comments of The Public Advocates Office on the Administrative Law Judge's Rulemaking to Consider Revisions and Updates to The Deaf and Disabled Telecommunications Program: Rulemaking 23-11-001, 01/22/2024; page 3.

⁴³ Reply Comments of The Public Advocates Office on the Administrative Law Judge's Rulemaking to Consider Revisions and Updates to The Deaf and Disabled Telecommunications Program: Rulemaking 23-11-001, 01/22/2024; page 7.

⁴⁴ National Diversity Coalition; January 09, 2024; page 4

⁴⁵ Comments of Center for Accessible Technology and The Utility Reform Network on Administrative Law Judge's Ruling Requesting Additional Information: Rulemaking 23-11-001, 10/11/2024; page 14

Commission should require DDTP to conduct future surveys or receive feedback by partnering with CBOs to design and implement surveys and feedback channels."⁴⁶

CD recommends the issuance of grant amounts totaling \$300,000, with priority given to four CBOs in rural areas.⁴⁷ This approach would ensure that persons with disabilities in these high-need areas are the first to benefit from expanded program access, aligning with Cal Advocates' recommendation to "engage in partnerships with CBOs that serve people with disabilities in rural areas to address this deficiency and improve program access more immediately."

The Needs Assessment Report identified service gaps in rural areas, where many individuals are unaware of California Connect offerings. Additionally, the National Deaf Center report shows that employment rates for all racial groups are lower for deaf individuals compared to their hearing counterparts in the United States and California (see below). Expanding outreach efforts through direct partnerships with local organizations and service centers will help bridge this gap.

2.8. Governance and Data-Driven Program Improvements

2.8.1. Updating Advisory Committee Charters & Needs Assessment Study

CD recommends collaborating with TADDAC and EPAC to explore opportunities to update their respective charters. The charters have not been updated since 2004 to reflect the committee members' roles in the modernization and evolution of technology, telecommunication services, and equipment.⁴⁸ To ensure the charters reflect current needs and priorities, CD suggests reviewing the proposed redline revisions suggested by committee

⁴⁶ Opening Comments of The Public Advocates Office on The Administrative Law Judge's Rulemaking to Consider Revisions and Updates to The Deaf and Disabled Telecommunications Program: Rulemaking 23-11-001, 01/09/2024, page 7

⁴⁷ Reply Comments of The Utility Reform Network and Center for Accessible Technology on the Commission's Order Instituting Rulemaking: Rulemaking 23-11-001, 01/22/2024; page 6.

⁴⁸ [California Connect – TADDAC](#)

members, seeking input, and ultimately supporting and adopting these updates through CPUC approval. This process will enhance the committees' effectiveness and alignment with the evolving goals of the California Connect to better serve consumers by providing broadband and wireless equipment and services.

The Needs Assessment Report initiative was completed shortly before the onset of the COVID-19 pandemic, which has rendered some of its findings somewhat outdated.

Although feedback from parties and Public Participation Hearing speakers' remarks⁴⁹ A follow-up study would be valuable, providing essential updates to supplement the original data and offering more relevant insights for CPUC Rulemaking 23-11-001.⁵⁰ Such a study would need to be conducted and concluded within the existing rulemaking timeline.

To maintain program effectiveness and data-driven decision-making, CD recommends conducting a Needs Assessment every five years, ensuring continuous evaluation and adaptation. These collective efforts will modernize the program's infrastructure and strengthen its role as a critical resource for Californians with disabilities, ensuring equitable access to essential telecommunications services.

CD recommends contracting with an external entity to administer the Needs Assessment, ensuring an objective and comprehensive approach. California LifeLine successfully used this model when it partnered with California State University, Sacramento, for its needs assessment.⁵¹ Similarly, Staff intends to contract with a neutral third party with

⁴⁹ Reply Comments of The Utility Reform Network and Center for Accessible Technology on the Commission's Order Instituting Rulemaking: Rulemaking 23-11-001, 01/22/2024; page 8.

⁵⁰ Comments of The Utility Reform Network and Center for Accessible Technology on the Commission's Order Instituting Rulemaking: Rulemaking 23-11-001, 01/09/2024, page 12-14

⁵¹ <https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/lifeline/california-lifeline-program-assessment-and-evaluation>

expertise in research and study methodologies, capabilities that extend beyond the scope of CPUC's internal resources.⁵²

2.8.2. Financial and Operational Considerations

CD recommends that the proposals outlined in this Staff report be carefully considered and incorporated into the proposed decision. Except for suggestions leading to expansion of program scope, CD anticipates minimal funding, rule, or service impacts, as the transition from landline-based equipment and services to IP and wireless technologies primarily involves a shift in the mode of delivery rather than a significant change in service offerings. This evolution is expected to streamline operations without incurring additional costs, ensuring continued service availability while modernizing the infrastructure.

Conclusion

The recommendations outlined in this proposal represent a strategic and comprehensive approach to modernizing the California Connect program to better serve individuals with disabilities. By integrating IP-enabled and wireless technologies, expanding emergency response capabilities, and transitioning to a direct-ship distribution model, California Connect will

enhance both service efficiency and accessibility. Strengthening collaborations with disaster relief agencies and community-based organizations will expand the program's reach and effectiveness.

Additionally, consolidating the program under a single California Connect brand, streamlining the application process, and updating advisory committee governance will improve program clarity, user experience, and operational oversight.

(END OF APPENDIX A)

⁵² Comments of Center for Accessible Technology and The Utility Reform Network on Administrative Law Judge's Ruling Requesting Additional Information: Rulemaking 23-11-001, 10/11/2024; page 1