

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 17, 2026

Agenda ID: 24005
RESOLUTION T-17888

TO: All current Telephone Corporations

Service List(s): All current Telephone Corporations

This Draft Resolution T-17888 of the Communications Division will appear on the agenda at the next Commission meeting to be held April 9, 2026, which is at least 30 days after the date of this letter. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting. When the Commission votes on a Draft Resolution, it may adopt all or part of it as written, amend, modify, or set it aside and prepare a different Resolution. The Resolution becomes binding on the parties only upon action by the Commission.

Any member of the public may serve comments on the Draft Resolution as provided in Public Utilities Code § 311(g) and Rule 14.5 of the Commission's Rules of Practice and Procedure (Rules).

Comments along with a certificate of service (COS) shall be sent via email to: kellie.jones@cpuc.ca.gov by March 5, 2026, at 5:00 PM. Also, copies must be served on the entire service list to which the Draft Resolution was originally served, on the same date that the comments are submitted to the Communications Division. Comments shall be limited to five pages in length.

Comments shall focus on factual, legal, or technical errors in the Draft Resolution and in citing such errors shall make specific references to the record or applicable law. Comments should list the recommended changes to the Draft Resolution.

Reply comments must be submitted no later than March 10, 2026. Replies shall be submitted and served in the same manner as opening comments and shall not exceed three pages in length.

Sincerely,

/s/ Robert Osborn, Director
Communications Division
California Public Utilities Commission

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Agenda ID: 24005
Consumer Programs Branch

RESOLUTION T-17888
April 9, 2026

RESOLUTION

Resolution T-18888: This Resolution denies Unity Wireless, Inc.'s request to be authorized as a California LifeLine service provider to offer discounted prepaid wireless telephone services supported by the California LifeLine Program to eligible low-income households throughout California, excluding tribal lands.

Proposed Outcome:

- Denies Unity Wireless, Inc.'s. (Unity Wireless) request for authorization as a California LifeLine service provider.

Estimated Costs:

- Unity Wireless will not be granted authorization to participate in the California LifeLine program and therefore will not be eligible for LifeLine subsidies for providing discounted prepaid wireless telephone services.

By Advice Letter #5, Filed on May 14, 2025.

Summary

By this Resolution, the California Public Utilities Commission (Commission) denies Unity Wireless, Inc.'s (Unity Wireless) (U-4550-C) request for authorization to become a California LifeLine service provider for the following reasons:

1. Unity Wireless has been operating and participating in the California LifeLine program without Commission authorization;
2. Unity Wireless is advertising and marketing California LifeLine without prior approval in violation of General Order 153-A requirements;¹
3. Unity Wireless is offering California LifeLine "Powered by" American Broadband and Telecommunications Company (AMBT) without Commission authorization; and

¹ General Order 153-A, Section 7.10 requires California LifeLine Service Providers to submit LifeLine consumer education and/or marketing materials, including scripts used by customer service representatives, to the Communications Division for review and approval prior to dissemination to the public.

4. Unity Wireless failed to disclose its business relationship with AMBT and is accessing the LifeLine Administrator's database by using AMBT's credentials.²

Unity Wireless' Advice Letter #5

On May 14, 2025, Unity Wireless filed a Tier 3 Advice Letter (AL) #5 to the Commission requesting designation as a California LifeLine service provider to offer discounted prepaid wireless telephone services to eligible households in California. Unity Wireless seeks authority to receive California Lifeline support only and does not seek federal Lifeline support.

BACKGROUND

Company Overview

Unity Wireless is a Delaware corporation with its principal office located at 21113 Johnson Street, Suite 101, Pembroke Pines, FL 33029. Unity Wireless is a wireless service provider that resells the services of UVNV, Inc. d/b/a Plum. Unity Wireless has a direct relationship (a Master Service Agreement) with UVNV, Inc. d/b/a Plum, and Plum operates on the T-Mobile Network. Unity Wireless participated in the federal Affordable Connectivity Program in other states, but not in California.

Unity Wireless obtained its wireless identification registration (WIR) (U-4550-C) from the Commission on September 2, 2022. As a registered wireless carrier in California, Unity Wireless is required to pay public purpose program surcharges based on the number of access lines, and user fees based on its California intrastate revenues.

Unity Wireless is currently providing California LifeLine service to California LifeLine customers without authorization as a California LifeLine service provider.

California LifeLine Program Requirements

The purpose of the California LifeLine Program is to provide high quality, residential communications services at affordable rates to low-income households in California. The California Legislature directed the CPUC to ensure that the program has essential consumer protections and is competitively neutral. A carrier seeking to be a California LifeLine service provider must comply with the CPUC's California LifeLine rules and requirements set forth in Public Utilities Code § 871 *et seq.*, General Order (GO) 153-A,

² LifeLine providers access the LifeLine Administrator's database through a Service Provider Intake Application Programming Interface (API) or SPIA that links to client record management systems (CRMs) developed by the LifeLine provider.

and various CPUC decisions including, but not limited to, Decision (D.) 17-01-032, D. 14-01-036 and D. 10-11-033. The carrier also must comply with all applicable CPUC rules, orders, decisions, resolutions, and the Public Utilities Code.

To become a California LifeLine service provider, a carrier must generally demonstrate the following:

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

DISCUSSION

Before recommending a carrier for designation as a California LifeLine service provider, staff must determine that doing so would be in the public interest for California consumers.⁷ Designating Unity Wireless as a California LifeLine service provider would not serve the public interest.

Staff discovered that Unity Wireless partnered with AMBT, a current California LifeLine provider with an eligible telecommunications carrier designation, without

³ See OP 3 of D.14-01-036.

⁴ See GO 153-A, §§ 9.5.3.1., 9.8.5, 9.8.6, 9.9.2, 10, and 11 and OP 21 of D.13-05-035.

⁵ See OP 26a. of D.14-01-036, *See also* GO 153-A, Appendix A.

⁶ On February 14, 2014, the CPUC's Communications Division issued an administrative letter titled "Guidance for Service Providers Interested in Offering California LifeLine Wireless Services Consistent with Decision 14-01-036." (Administrative Letter) [cdadvice_letter_filing_components_callwireless_approved_021414.pdf](#). This Administrative Letter provides instructions and guidance for a carrier seeking to become a California LifeLine provider to offer California LifeLine wireless services.

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

Commission authorization. AMBT⁸ granted Unity Wireless access to its credentials, allowing Unity to verify identities and directly enroll potential LifeLine customers. AMBT also allowed Unity Wireless to market and advertise the California LifeLine Program. As such, Unity Wireless advertises the LifeLine Program on its website “Powered By” AMBT⁹ and uses AMBT’s credentials to enroll customers.

Under D. 14-01-036, all service providers must obtain Commission authorization before offering California LifeLine services.¹⁰ As of January 1, 2026, 22,569 customers were enrolled by Unity Wireless without authorization to do so.¹¹ Further, neither AMBT nor Unity Wireless submitted marketing materials to the Commission as required. By advertising with “Powered By” language, Unity Wireless violated General Order 153-A, Section 7.10 by operating as a California LifeLine service provider marketing and advertising California LifeLine without prior approval.¹²

During the due diligence review for public interest, staff additionally discovered a number of public complaints filed with the Better Business Bureau (BBB) regarding Unity Wireless’ business practices related to providing California LifeLine services.¹³

⁸ On September 22, 2025, under confidentiality, Unity Wireless provided the CPUC’s Communication Division a copy of the Joint Services Agreement signed between Unity Wireless and AMBT on March 3, 2025.

⁹ [Unity Wireless - Free Service Provider](https://unitywireless.com/Why%20Unity%20Wireless%20?utm_source=organic&utm_medium=search&utm_campaign=organic-search); See [https://unitywireless.com/Why Unity Wireless?](https://unitywireless.com/Why%20Unity%20Wireless%20?utm_source=organic&utm_medium=search&utm_campaign=organic-search) (Visited October 22, 2025) “With Unity Wireless, you’re not just getting free service - you’re getting the best experience available through the Lifeline program. Thousands of households already trust Unity Wireless to stay connected - and most qualify instantly on their first try. Powered by American Broadband and Telecommunications Company LLC.”

¹⁰ Decision 14-01-036, Ordering Paragraph 24 also includes other requirements such as minimum service elements, filing tariffs or schedule of rates and charges, obtaining approval of marketing materials, and complying with Lifeline Administrator’s enrollment procedures. General Order 153-A Section 1.3, Appendices A and A-2 also specify rules for California Lifeline wireless service providers.

¹¹ The 22,569 subscriber count was provided by the California LifeLine Third-Party Administrator.

¹² GO 153-A, Section 7.10 - California LifeLine Service Providers will submit LifeLine consumer education and/or marketing materials, including scripts used by customer service representatives, to the Communications Division for review and approval prior to dissemination to the public. The LifeLine marketing materials will be deemed approved 30 days after filing unless the Communications Division notifies the LifeLine Service Provider in writing that it has suspended the review process. Written notice of suspension shall describe any unresolved issues or questions that merit additional review necessary to protect the integrity of the California LifeLine Program, ensure rule compliance, and prevent fraud. The California LifeLine Service Provider shall promptly respond to and work cooperatively with the Communications Division to expeditiously address compliance concerns raised by the LifeLine marketing materials review. The Communications Division will provide written notice of approval of LifeLine marketing materials that have been subject to suspension.

¹³ Complaints to the Better Business Bureau are available at: <https://www.bbb.org/us/fl/ft-lauderdale/profile/wireless/unity-wireless-inc-0633-92028598/complaints>

For example, on September 15, 2025, a customer complaint was filed with the BBB against Unity Wireless for failing to provide a phone after signing up for California LifeLine benefits. Unity's response to the complainant was that the account was "locked due to a freeze placed by California." The complainant stated that they also tried to file a complaint with the Commission's Consumer Affairs Branch (CAB). The complainant further stated that CAB informed them that Unity was "run by another company."

On October 10, 2025, a customer complaint was filed with the BBB alleging that Unity Wireless enrolled a LifeLine customer without their consent. The complainant requested the account be closed and flagged as fraudulent. Additionally, the complainant expressed concern that their account continued to be transferred without consent.

On November 4, 2025, the Communications Division (CD) issued a Cease-and-Desist Notice directing AMBT to terminate its unapproved partnership with Unity Wireless and to cease offering California LifeLine services through Unity Wireless.¹⁴

As demonstrated by the complaints, these actions by Unity Wireless violate the program rules, undermine the Commission's regulatory process, and compromise the integrity of the LifeLine program. Unity Wireless' actions fall into the category of "waste, fraud, and abuse" in the LifeLine program. As such, any future application for authorization to become a California LifeLine service provider may require additional terms and conditions Unity Wireless will need to fully comply with requirements in GO 153-A including receiving prior approval of marketing and advertising materials, among others.

To protect the integrity of the LifeLine Program and prevent a recurrence of noncompliance, Unity Wireless should be barred from reapplying during the period required for the Commission to address the issues related to Cease-and-Desist Notice issued to AMBT. Accordingly, Unity Wireless cannot reapply for California LifeLine

¹⁴ Between July 2025 and September 2025, CAB received over 1,400 complaints against AMBT and its partners, which is an increase of over 3050% from the previous quarter. This increase in complaints coincides with AMBT's partnerships with non-approved service providers including Unity Wireless, but it is unclear which provider is the source of the complaints. The complaints include LifeLine transfers without affirmative customer consent, unauthorized service disconnections that left customers without service, and failure to provide mobile devices upon enrollment.

authorization until the Cease-and Desist issues are resolved, or 24 months, whichever is later.¹⁵

Lastly, Unity Wireless shall cooperate with CD and the LifeLine Administrator to implement an orderly migration of its LifeLine customers to Commission authorized LifeLine providers. Unity Wireless shall comply with all customer notice requirements and take all actions directed by CD to ensure a seamless continuity of service and prevent customer harm during the transition.

Notice/Protests

Unity Wireless served its AL #5 filing via email to all parties on the Telco service list and AL #5 appeared in the Commission's Daily Calendar on February 3rd, 2026.

COMMENTS

In compliance with Public Utilities Code § 311(g), the Commission emailed a notice letter on February 3rd, 2026, informing all parties on Telco service list and R.20-02-008 service list of the availability of this resolution for public comments at the Commission's website. The notice letter also informed parties that the final confirmed resolution adopted by the Commission will be posted and available at the same website.

Findings and Conclusions

1. Unity Wireless, Inc. (Unity Wireless) is a Delaware corporation with its principal office located at 21113 Johnson Street, Suite 101, Pembroke Pines, FL 33029.
2. Unity Wireless is a prepaid wireless service provider that resells the services of UVNV, Inc. d/b/a Plum via T-Mobile's network.
3. Unity Wireless participated in the Affordable Connectivity Program and provided services to low-income individuals in multiple states, but not in California.
4. Unity Wireless obtained its WIR (U-4550-C) from the Commission on September 2, 2022.

¹⁵ The Commission has broad regulatory authority over public utilities under Public Utilities Code section 701 and 702. Section 701 states: "[t]he commission may supervise and regulate every public utility in the State and may do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction." Section 702 states "[e]very public utility shall obey and comply with every order, decision, direction, or rule made or prescribed by the commission in the matters specified in this part, or any other matter in any way relating to or affecting its business as a public utility, and shall do everything necessary or proper to secure compliance therewith by all of its officers, agents, and employees."

5. On May 15, 2025, Unity Wireless filed a Tier 3 Advice Letter (AL) #5 requesting designation as a California LifeLine service provider to offer discounted prepaid wireless telephone services to eligible households in California throughout California, excluding tribal lands.
6. Unity Wireless failed to reveal its business relationship with AMBT.
7. Unity Wireless failed to reveal it uses AMBT's credentials and is establishing identity and eligibility for California LifeLine benefits without Commission authorization.
8. Unity Wireless is currently marketing and advertising LifeLine without Commission approval from the Commission.
9. A due diligent review of Unity Wireless' business practices determined the company received complaints related to LifeLine benefits although it has not been authorized to offer California LifeLine.
10. The actions of Unity Wireless constitute waste, fraud, and abuse.
11. Resolution of all issues related to the Cease-and Desist Notice issued to AMBT on November 4, 2025 must be resolved before Unity Wireless can apply for authorization to provide California LifeLine service, which is at least 24 months from approval of this Resolution.
12. To ensure continuity of service, Unity Wireless must work with CD and the California LifeLine Administrator to transition its customers to Commission authorized Lifeline providers.

THEREFORE, IT IS ORDERED that:

1. Unity Wireless, Inc.'s request for authority to offer California LifeLine is denied.
2. Unity Wireless, Inc. is barred from applying for authorization to provide LifeLine service in California until the issues in the Cease-and-Desist Notice issued to American Broadband and Telecommunications Company are surfaced and resolved or 24 months from the effective date of this Resolution, whichever is later.

3. Any future request for authority to offer California LifeLine may include additional terms and conditions.
4. Unity Wireless, Inc. shall cooperate fully with the Communications Division and the California LifeLine Administrator to transition its customers to Commission-authorized LifeLine providers and follow all directives from the Communications Division to ensure uninterrupted service and prevent customer harm, including customer notifications.

This Resolution is effective today.

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on April 9, 2026; the following Commissioners voting favorably thereon:

Commissioner Signature blocks to be added

upon adoption of the resolution