

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



October 4, 2021

President Batjer
Commissioner Aceves
Commissioner Houck
Commissioner Rechtschaffen
Commissioner Shiroma

SUBJECT: Annual Report of The Universal LifeLine Telephone Service for the Period July 1, 2020, through October 1, 2021.

Pursuant to Section 4.1.b of the Charter of the Universal LifeLine Telephone Service Trust Administrative Committee (Committee), Communications Division, on behalf of the Committee, submits the enclosed annual report for the period July 1, 2020, through October 1, 2021. The report was discussed approved by the Committee on September 22, 2021.

Sincerely,

Mary Rottman
LifeLine Program Liaison
Communications Division

cc: R. Osborn, Director
M. Worster, Program Supervisor
Committee Members

Encl.

**ANNUAL REPORT OF THE UNIVERSAL LIFELINE TELEPHONE SERVICE
TRUST ADMINISTRATIVE COMMITTEE (ULTS-AC)**

FOR THE PERIOD JULY 1, 2020 THROUGH OCTOBER 1, 2021

**Submitted by: The Universal LifeLine Telephone Service Trust Administrative
Committee**

Date submitted: October 4, 2021

UNIVERSAL LIFELINE TELEPHONE SERVICE TRUST – ADMINISTRATIVE COMMITTEE

Pursuant to Public Utilities (P.U.) Code Section 277(a) the ULTS-AC was established to serve as an advisory committee to the California Public Utilities Commission (CPUC or Commission). The role of the ULTS-AC is to advise the CPUC regarding the development, implementation and administration of the Universal Lifeline Telephone Service Trust (ULTS or LifeLine) program to ensure LifeLine telephone service is available to the people of the State as provided by Assembly Bill 1348 (AB 1348), and subsequently modified by Senate Bill 669 (SB 669).

The Moore Universal Telephone Service Act

AB 1348 was introduced to ensure the availability of affordable basic local telephone service to all qualifying low-income households in California. This bill became law in September 1983 and is known as Article 8. Universal Telephone Service, Public Utilities Code Section 871. The California LifeLine program (formerly known as Universal LifeLine Telephone Service or ULTS) or “LifeLine” provides subsidized basic telephone service to qualifying residential subscribers. Under the California LifeLine program, a customer may select any carrier from those that provide residential local exchange service in the customer’s area. The LifeLine program is funded by a surcharge, as determined by the CPUC, on the end of the user’s bill for intrastate telecommunications services. There are approximately 1.38 million subscribers as of September 22, 2021, who receive subsidized telephone service through wireline or wireless service providers.

ULTS Marketing Board (ULTSMB)

Pursuant to Decision (D.) 96-10-066 the ULTSMB was established as the entity responsible for developing designing and implementing a competitively neutral marketing strategy for the LifeLine program. The intent of the Decision was to provide basic telephone service to all qualifying low-income households in California. In 2000, a LifeLine call center was established to help facilitate customer access to local telephone service providers in a competitively neutral manner or of the customers’ choice in order to establish service. The call center was staffed by telephone representatives who assisted customers with any questions relating to the California LifeLine program. Additionally, representatives were available in seven languages for the non-English speaking customers identified as part of the target audience. The call center has since

been expanded to include available representatives in eleven languages plus English. Senate Bill 669 (SB 669) implemented changes to the ULTSMB relative to the program administration of the LifeLine program. Under SB 669, the existing ULTSMB was disbanded and the new ULTS-AC board was created. This bill required that the 2 administrative responsibilities for the California LifeLine program become the responsibility of the CPUC. Oversight of the LifeLine program was assigned to the CPUC's Telecommunications Division (TD), now called the Communications Division (CD). Therefore, the role of the ULTS-AC under the SB 669 became an advisory entity.

ULTS-AC

By Commission Decision 02-04-059, the restructuring of the California LifeLine advisory board was completed, and the establishment of the new ULTS-AC commenced effective February 1, 2003. The CPUC's CD is the program administrator overseeing the California LifeLine contract administration and marketing activities with advice from the ULTS-AC in its new advisory capacity. In November 2003, the ULTS-AC made significant modifications to the original Plan which had carried over and had been implemented as part of the current California LifeLine marketing program administered by Richard Heath and Associates (RHA) with oversight by the Communications Division. The current composition of the ULTS-AC reflects a broad diverse group of individuals with representation from small and large incumbent and competitive local telephone companies, community-based organization and consumer advocacy groups. The experience and knowledge that each member possesses has allowed the ULTS-AC to work diligently to advise the Commission on the development of a strong marketing plan in order to achieve our goals of reaching 95% subscribership among all eligible consumers in the state. The ULTS-AC continues to ensure that the California LifeLine program targets all eligible low-income segments of the population of California including, but not limited to African American, Cambodian, Chinese, Filipino, Hispanic, Hmong, Korean, Laotian, Vietnamese, Native Americans, Seniors and social agency and welfare recipients. To achieve this, it is imperative that the ULTS-AC working with CD continues to:

- Track and report monthly the activities of the marketing, outreach and call center programs for California LifeLine
- Track enrollment data
- Identify target groups that have low-penetration rates
- Monitor education and outreach message dissemination

- Monitor Call Center activities
- Track the California LifeLine Program Administrator’s recertification process to ensure LifeLine customers recertify based on their household income or eligible program qualifications each year
- Continue to advise on all education and outreach material in language specific form with correct and consistent information
- Identify problems with the marketing campaign and make recommendations for correction and improvement.

ULTS-AC Goals and Objectives

- Meet regularly under the Provisions of Bagley-Keene Open Public Meeting Act
- Follow procedures mandated by Charter
- Provide recommendations to the Commission and CD on R.20-02-008
- Monitor and evaluate CBO education and outreach
- Closely monitor CPUCs Conflict of Interest Concerns Relative to the impact on ULTS-AC members
- Monitor ULTS-AC Budget
- Review Senate and Assembly Bills impact on California LifeLine
- Continual interaction with LifeLine program contractors
- Monitor legislative, CPUC and FCC activities that may impact California LifeLine program or consumers in California
- Submit yearly California LifeLine budget for review and approval by Commission resolution

ULTS-AC Accomplishments

Between July 1, 2020 and October 1, 2021, the ULTS-AC met a total of 4 times.

During these meetings, the ULTS-AC provided the following advice to the CPUC:

- Submitted budgets
- Provided advice to the Communications Division on California LifeLine contractors
- Reviewed and monitored program expenditures and surcharge income
- Provided feedback to the call center contractors

- Provided feedback to CD staff regarding changes in the California LifeLine program

The ULTS-AC provides an important vehicle for the CPUC to receive information from interested parties who are key to the provision of the LifeLine program, service providers, consumer groups and community organizations. We remain dedicated to that goal and anticipate continuing to serve the public and the CPUC in the coming years. With that goal in mind, the ULTS-AC is also providing in this report a list of recommendations for various topics the Commission should address in the coming year that the ULTS-AC believes will improve the LifeLine program.

Significant Program Changes During Report Period 2020/2021

- February 27, 2020 – The Commission opens Rulemaking (R.) 20-02-008 to update and modernize the California LifeLine Program.
- March 19, 2020 – Assigned Commissioner Genevieve Shiroma releases a Ruling Temporarily Suspending Renewal Requirements for 90 days due to the COVID-19 pandemic.
 - On March 17, 2020, California Governor Gavin Newsom issued Executive Order N-29-20 which temporarily suspended renewal requirements for 90 days for several public assistance programs, not including LifeLine.
 - On March 17, 2020, the Federal Communications Commission (FCC) issued Order DA-285 to temporarily waive the federal Lifeline program’s recertification and recertification requirements for 60 days.
- July 16, 2020 – Decision (D.) 20-07-012 released which denies a Telehealth pilot proposal and instructs Communications Division to include online surveys in its assessment of the LifeLine program.
- October 2020 – Third Party Assessment of LifeLine Program begins, pursuant to Legislative Analyst’s Office’s 2019 report.
 - California State University, Sacramento contracted to conduct external program evaluation with the goal of increasing enrollment and re-enrollment rates, and improving the accuracy of caseload estimates.
 - Evaluation broken into four main phases focusing on, market competition, process evaluation, program awareness, and program and policy considerations.
 - Each phase will have a separate report with all four reports submitted by December 15, 2021.

- October 8, 2020 – D.20-10-006 released which established new Minimum Service Standards (MSS) and Specific Support Amounts (SSA) for LifeLine.
 - For both Wireline and Wireless: Expanded LifeLine to include broadband as an officially supported service type (when bundled with voice).
 - For Wireless Service: Created four tiers of service each with separate SSA and MSS. Two tiers, the “Basic” and Standard” plans require the LifeLine service provider to not charge a co-payment to the LifeLine customer.
 - For Wireline Service: Created two tiers of service, a “standalone” voice tier with no broadband requirement and a “bundled” tier which required voice and broadband service.
- November 5, 2020 – D.20-11-006 released which modifies iFoster Pilot Program.
 - The COVID-19 pandemic increased the need for data services to allow foster youth to participate in things like distance learning.
 - The Pilot had under-spent \$6 million in its approved budget due to lower than expected enrollment levels.
 - The Pilot’s monthly subsidy was increased from \$25 to \$40 per participant per month and increased the monthly data allotment from 3 gigabytes (GB) to 47 GB of data.
- January 25, 2021 – LifeLine General Order 153 Working Group submits its Final Revisions to General Order 153.
- February 5, 2021 – LifeLine Renewal Working Group submits its Final Proposal on improvements to the LifeLine renewal process.
- February 25, 2021 – ALJ Ruling Extending the suspension of the LifeLine renewal process through June 30, 2021 and ending the suspension of de-enrollments for non-usage beginning on May 1, 2021.
 - On February 24, the FCC issues Order DA 21-229 which extended the suspension of the federal Lifeline program’s renewals process through June 30, 2021 and ends the suspension of de-enrollments for non-usage on May 1, 2021.
- March 2, 2021 – Staff Report on Boost/CARE Pilot released for comment.
 - Staff recommends concluding the pilot because it did not meet its goal of meaningfully increasing participation in the LifeLine program.
- May 6, 2021 – Staff Report on iFoster Pilot Program released for comment.
 - Staff recommended extending the pilot for an additional 14 months until January 2023, lowering the broadband data allotment to 6 GB from 47 GB, and developing a categorical LifeLine eligibility for foster youth after the pilot concludes.

- May 12, 2021 – Emergency Broadband Benefit (EBB) Program begins.
 - The EBB is a temporary program created by the FCC to reduce the price of broadband internet service for households struggling during the COVID-19 pandemic.
 - EBB provides a discount of up to \$50 (\$75 for tribal customers) per month for eligible households receiving a qualifying broadband service.
 - Although EBB is not tied directly to LifeLine service and customers may receive both an EBB and a LifeLine discount, both programs share similar eligibility requirements and goals.
- June 3, 2021 – Resolution (Draft) L-611 released.¹
 - Resolution L-611 brings the LifeLine Minimum Service Standards (MSS) into compliance with a May 5, 2021 federal court ruling which enjoins the Commission from implementing a \$0 co-pay for the “Basic” and “Standard” tiers of the wireless MSS.
- June 25, 2021 – Ruling requesting comments on Staff Proposal updating Specific Support Amounts and Minimum Service Standards, effective December 1, 2021.
 - Staff anticipated a reduction or elimination of federal Lifeline benefits for voice-only wireline service and recommended making up a portion of the reduced federal funding depending on how much the federal Lifeline program reduced its wireline subsidy.
 - Staff presented data showing wireless LifeLine data usage and recommended eliminating the “Upgrade” plan of wireless LifeLine service, increasing the “Basic” plan’s monthly data allotment from 4 GB to 4.5 GB, and reduce the “Family” plan’s monthly data allotment from 12 GB to 6 GB.
 - The Ruling also requested LifeLine providers file additional information on LifeLine customers data usage and subscription and pricing information for wireline voice-only customers.
- July 19, 2021 – D.21-07-008: Decision Addressing California LifeLine Pilot Programs of Boost Mobile and iFoster, Inc.
 - Extended the iFoster pilot program, authorized in D.19-04-021, through January 31, 2023.
 - Required T-Mobile and Sprint to serve anonymized versions of all data regarding the Boost Mobile pilot program to the LifeLine service list.

¹ <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M385/K985/385985125.PDF>

- T-Mobile and Sprint shall file an Advice letter proposing plans to extend the Boost Mobile pilot.
- July 19, 2021 – D.21-07-035: Order Denying Rehearing of D.20-10-006
 - On November 16, 2020, TC Telephone, a wireline LifeLine service provider, filed an application for rehearing of D.20-10-006’s elimination of measured rate wireline LifeLine service.
 - The Commission finds that it has the authority to eliminate subsidies for measured rate service, that Public Utilities Code section 874(b) does not require LifeLine providers to offer measured rate service, that the decision is adequately supported by the record, and that the Straw Proposal to eliminate measured rate service was properly notified to parties.
 - The Commission denies the request for Oral Argument and denies the application for rehearing.
- July 30, 2021 – DA-21-930: Federal Communications Commission releases its revisions to the federal Lifeline Minimum Service Standards, effective December 1, 2021.
 - Wireless LifeLine MSS for broadband data allotments increase from 4.5 GB to 18 GB of data per month.
 - Wireless Voice service MSS remain at 1000 minutes of use per month.
 - Wireline Broadband MSS set at 1,229 GB of data per month.
- September 22, 2021 – DA-21-1191: Federal Communications Commission extends prior COVID Lifeline Program Waivers to December 31, 2021.
 - Includes waivers for revivification, recertification, and general de-enrollment.
 - On September 23, 2021, Administrative Law Judge Stephanie Wang released a Ruling extending the suspension of certain process and rules for California LifeLine through December 31, 2021, consistent with DA-21-1191.
- September 23, 2021 – D.21-09-023: Decision Revising General Order 153, Authorizing Eligibility Verifications Through Database Access, and Establishing Specific Support Amounts
 - Makes major revisions and updates to General Order 153 to reflect decisions and resolutions impacting the LifeLine program issued since 2011, when the Commission last issued comprehensive updates to General Order 153.

- Authorizes the LifeLine program administrator to establish LifeLine participant's Program eligibility based on a review of databases of participants of qualifying state or federal programs.
- Makes several revisions to the Specific Support Amounts and Minimum Service Standards for LifeLine, including eliminating the "Upgrade Plan" tier of wireless LifeLine, raising the "Basic Plan" tier of wireless LifeLine's data allotment to 4.5 GB per month, and reducing the data allotment for wireless LifeLine "Family Plans" to 6 GB per month.
- Adopts the Staff Proposal regarding replacement of federal Lifeline funds for wireline California LifeLine customers.

ULTS-AC's Identification of Important Issues for the Commission to Consider

Introduction

The Universal LifeLine Telephone Service Trust Administrative Committee (ULTS-AC) has identified several topics that we believe the California Public Utilities Commission (Commission) should address in the Commission's ongoing LifeLine Modernization proceeding, Rulemaking (R.)20-02-008 or its successor proceeding. The ULTS-AC is not providing specific recommendations for how the Commission should address each topic; instead, this list should serve as a checklist of areas where the Commission can improve the LifeLine program. Additionally, the list of topics is presented in no particular order to give the Commission the discretion to address each topic in whatever order it chooses.

Sacramento State University LifeLine Program Assessment

California State University, Sacramento began its evaluation of the LifeLine program in October 2020 and is expected to finalize its report by December 2021. This evaluation will cover all aspects of the LifeLine program and may reveal new or important issues which the Commission should prioritize addressing. The Commission should present California State University, Sacramento's report in the LifeLine rulemaking so that interested parties can provide public comments and feedback. This feedback, coupled with the report, will help the Commission prioritize the issues that should be addressed in the LifeLine rulemaking.

Grow and Expand Participation in the LifeLine Program

The Commission should prioritize improvements to the LifeLine program that will grow and expand participation in the LifeLine program. Serving the greatest number of California residents is a key tenant of the LifeLine program. Public Utilities Code Section 871.7 states that the purpose of the LifeLine program was originally to “...offer high quality basic telephone service to the greatest number of California residents...”

Therefore, as the Commission seeks to improve the LifeLine program, it should always consider how each improvement may affect participation rates and prioritize improvements that have a greater impact on participation.

Ongoing Improvements to Renewal and Recertification

In addition to expanding participation, the Commission should also continue to improve on the LifeLine program’s renewal and recertification process for existing LifeLine participants. The recently adopted D.21-09-023 acknowledged five recommendations from the Renewals Working Group aimed at improving the renewals and recertification process for LifeLine participants.² D.21-09-023 states that one of the five recommendations has already been implemented, three do not require a Commission decision, and the final one, third-party database access is reasonable and should be approved.³ The ULTS-AC applauds the Commission for authorizing the Renewal Working Group’s recommendations but encourages the Commission to continue its work to improve the renewal and recertification process. Improving renewals and recertification must be an iterative process whereby the Commission implements improvements, assesses their impacts, and continually pushes to refine the renewal and recertification process.

Community Outreach and Marketing

The Commission should consider how it can improve marketing and community outreach for the LifeLine program. The LifeLine program currently lacks a unified marketing and community outreach strategy. Instead, the Commission currently relies on individual LifeLine service providers to market and advertise the LifeLine program to the public. Although this method may be effective, there has been no recent review or attempt to improve LifeLine’s marketing or outreach in any way. It’s possible that households that

² *Decision Revising General Order 153, Authorizing Eligibility Verifications Through Database Access, and Establishing Specific Support Amounts*, D.21-09-023, R.20-02-008, September 23, 2021, page 8.

³ D.21-09-023, pages 8-10.

are eligible for LifeLine aren't enrolled because they are ill informed of the LifeLine program. Also, there may be particular demographics of LifeLine-eligible households, such as non-English speakers, which receive inadequate LifeLine marketing. The Commission could survey existing and potential LifeLine customers to identify gaps in non-English LifeLine marketing material. The Commission should also consider how it can partner with community based organizations, local governments, and other public purpose programs to market the LifeLine program.

Continuation of Voice-Only LifeLine Support

The Commission should consider if and how it can permanently support voice-only LifeLine service in light of declining subsidies from the federal Lifeline program. The Federal Communication Commission's (FCC's) 2016 Lifeline Reform Order⁴ outlined a multi-year phase out of voice-only Lifeline service culminating in federal-voice only Lifeline subsidies declining to \$0.00 per month starting December 1, 2021. In the years since 2016 the Commission has made incremental adjustments to address the gradual phase down in federal support, but has not made a permanent decision on what to do with voice-only LifeLine service once federal support ends. The Commission should evaluate whether it is worthwhile to continue to support voice-only LifeLine service without any federal funding and if so, if voice-only LifeLine customers should receive some additional subsidies on top of the normal LifeLine subsidy.

Synchronization with the Federal Lifeline Program

The Commission should assess whether it is worthwhile to continue to synchronize with the federal Lifeline program or if California's LifeLine program should be more autonomous. California LifeLine customers generally receive subsidies from both the California LifeLine program and the federal Lifeline program. This combined state and federal subsidy makes essential communications services more affordable for LifeLine customers than if they received only the state or only the federal subsidy. California LifeLine customers can only receive the federal subsidy if they adhere to federal rules and eligibility standards. This has lead California LifeLine to synchronize with the federal Lifeline program where possible, albeit with somewhat more expansive rules and standards. However, continued synchronization with the federal program may preclude the Commission from adopting revisions to the state program that would have otherwise been considered. For example, if the California LifeLine program became more autonomous from the federal program, California LifeLine could more easily expand

⁴ FCC 16-38.

LifeLine’s eligibility standards or alter LifeLine’s enrollment and recertification rules. Additionally, the Commission should consider how autonomy from the federal Lifeline program would impact funding for California LifeLine participants as most participants receive approximately 38% of their monthly LifeLine subsidy from the federal Lifeline program. The Commission should consider if the benefits of maintaining federal subsidies are more important than more control over the state program’s rules and regulations.

Leveraging Other Public Purpose Programs

The Commission should consider how it can leverage other public purpose programs to improve the LifeLine program. For example, the LifeLine program could coordinate marketing and outreach efforts with other state or local public purpose programs or coordinate eligibility determinations using existing enrollment databases, among other things. In fact, the Commission has already attempted this through a pilot program designed to directly market LifeLine to customers of the Commission’s California Alternate Rates for Energy (CARE) program.⁵ However, that pilot program was narrow in scope and was only one of many possible ways the Commission could leverage other public purpose programs to expand and improve LifeLine. The Commission should evaluate the successes and failures of that pilot as described in the “Boost/CARE Pilot Evaluation Report”⁶ and in D.21-07-008⁷ as it considers how it can leverage other public purpose programs to improve LifeLine.

Additionally, the ULTS-AC commends the Commission on the recently adopted D.21-09-023 which authorizes the LifeLine Third Party Administrator to establish participants’ Program eligibility based on a review of databases of participants of qualifying state or federal programs.⁸ More than 97% of recently enrolled LifeLine participants used a “programmatic” eligibility to qualify for LifeLine, the vast majority of which using participation in either CalFresh or Medi-Cal.⁹ Establishing participant eligibility through CalFresh and Medi-Cal will streamline the eligibility determination process for most LifeLine participants which has consistently been a sore point in both the enrollment and

⁵ *Decision Authorizing Pilot Programs of Boost Mobile, Inc. and iFoster, Inc. in the California LifeLine Program*, Decision (D.)19-04-021, R.11-03-013, May 3, 2019.

⁶ *Boost/CARE Pilot Evaluation Report*, Communications Division - LifeLine Group, R.20-02-008, March 2, 2021.

⁷ *Decision Addressing the California LifeLine Pilot Programs of Boost Mobile, Inc. and iFoster, Inc.*, D.21-07-008, R.20-02-008, July 19, 2021.

⁸ D.21-09-023, Conclusions of Law 3, page 27.

⁹ *California LifeLine Administrator Presentation to the Administrative Committee, September 22, 2021*, “#7 Maximus CA LifeLine – ULTS Ac Mtg Updated 9.17.21.pptx,” Maximus, Enrollment Eligibility Method June – August 2021, pages 11-12.

annual recertification processes for LifeLine participants. The Commission should also provide regular updates to the ULTS-AC and the LifeLine rulemaking describing successes and challenges with the database partnership effort to allow interested parties to provide input and help the implementation effort.

Pilot Programs

The Commission should reevaluate how it designs, approves, monitors, and reviews the results from LifeLine’s pilot programs. The Commission established the criteria for Pilot programs and partnerships within the LifeLine program in D.18-12-019.¹⁰ However, given the apparent shortcomings of the recent Boost/CARE pilot, the Commission should reevaluate how it reviews and approves pilot program proposals to ensure each pilot is set up for success. For example, the Commission could consider adopting a phased approach to pilots, starting with a small proof of concept and later expanding to include more LifeLine participants. Overall, developing a stronger framework for designing, approving, monitoring, and reviewing the results of LifeLine pilot programs will help achieve the goal of testing new and innovative strategies to improve the LifeLine program.

LifeLine Subsidy Amount

The Commission should review the monthly specific support amount (SSA) provided to each LifeLine participant to ensure that it enables LifeLine participants to purchase affordable essential communications services. LifeLine’s SSA has historically been based on a percentage of AT&T’s retail wireline voice rate. The Commission should consider if LifeLine’s SSA should be calculated via some alternate methodology that would more accurately reflect the needs of LifeLine’s wireless and wireline participants for both voice and broadband services.

Other Areas the Administrative Committee Wishes to Focus on:

Administrative Committee Vacancies

Over the next year, the ULTS-AC aims to fill all primary and alternate position vacancies on the Committee. As of September 22, 2021, the most recent ULTS-AC Meeting, the ULTS-AC has 2 primary position vacancies and 7 alternate position vacancies.¹¹ Filing

¹⁰ *Decision Establishing the Criteria for Pilot Programs and Partnerships within the California LifeLine Program*, D.18-12-019, R.11-03-013, December 18, 2018.

¹¹ *ULTS Administrative Committee Meeting Agenda*, “#1 Final_9_22_21_Meeting Agenda.pdf,” September 22, 2021.

these vacant positions is crucial to bringing a diverse set of opinions and perspective to the ULTS-AC which will, in turn, allow the Committee to provide better advice to the Commission. To accomplish this goal, the ULTS-AC and its committee members will reach out to other advisory boards to access a broader group of potential Committee members. ULTS-AC members are also encouraged to advertise the vacant positions within their own professional networks.

LifeLine Program Budgeting Process

The ULTS-AC is also interested in delving deeper into the LifeLine budgeting process. The ULTS-AC would like to better understand how the LifeLine program forecasts its annual budget as well as how the LifeLine program adjusts the budget for costs associated with programmatic improvements, such as the recently approved database access partnerships.

Lessons Learned from Audits of LifeLine Service Providers

The ULTS-AC would also like to review the results of previous audits on LifeLine service providers to identify lessons learned and improvements that could be applied to all LifeLine service providers. In recent years, several LifeLine service have been audited for compliance with LifeLine rules and regulations.¹² These independent audit reports could be a great way to identify areas of improvement in the way the LifeLine program is administered. Therefore, the ULTS-AC will evaluate the findings from the LifeLine service provider audits to determine if any lessons learned can be applied to the broader LifeLine program.

Conclusion

The ULTS-AC understands that the LifeLine program is constantly evolving and improving over time and hopes that the issues listed here will help the Commission prioritize addressing the issues that will have the greatest impact on LifeLine participants. The ULTS-AC looks forward to further discussions between its members and with the Commission on more ways to innovate and improve the LifeLine program.

¹² See, for example, the Independent Accountant's Report of Telscape Communications, Inc. DBA TruConnect – California LifeLine Program, which was completed by the California State Controller's Office on December 16, 2019.

https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/utility-audits--risk--and-compliance-division/reports/communications/2019/communications_2019-12-16_telscape_califeline.pdf