


2021 Annual Report

California LifeLine Program

Program Years January 2019 – December 2021

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California Public Utilities Commission

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About this Report

California's longstanding goal is to provide high-quality basic telephone service at affordable rates to the greatest number of people.[1]

The Moore Universal Telephone Service Act (Moore Act) has been, and continues to be, an important means for achieving universal service by making basic telephone service affordable to low-income households through the creation of a lifeline class of service.

Pursuant to Public Utilities Code Section 914.1, the purpose of this report is to comply with the Moore Act by reporting annually to the Legislature, in a public document, information relative to the actions undertaken by the Commission implementing the LifeLine Telecommunications Universal Service Program as governed by subdivision (a) of Section 873 of the Public Utilities Code.

[1] The Moore Universal Telephone Service Act, AB 1348, Ch. 1143, Stats. 1983 [Calif. Pub. Util. Code S 871 et seq.], as amended.

Commissioner's Message

As the assigned Commissioner to the California Public Utilities Commission's LifeLine proceeding, I am pleased to join in highlighting the many accomplishments of the California LifeLine program in 2019-2021.

The COVID-19 pandemic has underscored the importance of telecommunications service as Californians relied on phone and internet service for telehealth, education, and connecting with critical family and friend support systems. LifeLine service, both wireline and wireless, serves as a nexus connecting our most vulnerable communities, including the elderly and foster youth, to emergency services in natural disasters, providing early warnings of wildfire and Public Safety Power Shutoffs, and facilitating access to emergency evacuation routes and essential resources at Community Resource Centers. The LifeLine team at the California Public Utilities Commission continues to identify opportunities to make the program more robust and responsive to the needs of Californians.

The LifeLine program has met this moment of extreme need every step of the way: expanding data coverage in our iFoster LifeLine program pilot and making the program permanent, bringing broadband to the LifeLine program to bridge the digital divide, and creating innovative strategies to ease program enrollment and renewals by collaborating with other state social service programs. In response to the pandemic, and in conjunction with the Federal Communications Commission, the LifeLine program took action to suspend the renewal process, keep LifeLine customers connected to the program and support steady access as we navigated the challenges of the COVID-19 pandemic. I thank all the Commission staff, the Universal LifeLine Telephone Service Advisory Committee, the dedicated community advocates, and the LifeLine providers for their commitment to the LifeLine program and the advancement of universal telecommunications service in California. As the late Assemblywoman Gwen Moore, mother of the California LifeLine program and author of the Moore Universal Telephone Service Act, said, "Equality of opportunity in the 21st century is dependent on how well we ensure that technology is widely available to people of all walks of life."

Sincerely,

Genevieve Shiroma, Commissioner
California Public Utilities Commission

Executive Summary

The California Public Utilities Commission (CPUC) in 1984 established the California LifeLine Program (LifeLine or Program) to ensure that high-quality basic communications services remain affordable for low-income Californians. The Program was codified in Public Utilities Code § 871 as the Moore Universal Telephone Service Act, and it provides discounted or no-cost communications service to up to 1.7 million low-income households. At the Program's inception, California LifeLine subsidized basic wireline residential telephone services. Over the years, the Commission has expanded the Program to integrate equity and access considerations consistent with the Commission's Environmental and Social Justice (ESJ) Action Plan goals[2]. The Program has expanded to include LifeLine wireless and Voice Over Internet Protocol services. The CPUC continues to improve the program by incorporating new technologies, innovative pilot programs, and other changes to best meet the needs of low-income, underserved, and vulnerable households.

This annual report summarizes the Program's key initiatives and accomplishments for years 2019 through 2021. In 2019, the Program launched innovative pilot programs with iFoster and Boost Mobile in Decision D. 10-04-021, which offered discounted wireless phone service to foster youth and California Alternative Rates for Energy (CARE) recipients. In 2020, the Commission opened Rulemaking R. 20-20-008 to update and modernize the Program, which included establishing new California LifeLine Minimum Service Standards (MSS) and Specific Support Amounts (SSA).[3]

In 2020-2021, the CPUC acted swiftly to respond to the COVID-19 pandemic by suspending Program renewal, re-enrollment, and eligibility validation procedures to ensure participants had continued access to essential communications services for school, work, health care and to connect with family and friends during the pandemic.[4] Additionally during this time, the CPUC upgraded iFoster pilot participants' wireless data plans to support their distance learning and contact with family and service providers in response to COVID-19.[5]

Additional program initiatives include:

- **CalFresh Agreement on Eligibility Verification** – Began testing CalFresh database matching with LifeLine program participants to automate program renewals.

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[2] https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan

[3] See D. 20-10-006

[4] March 19, 2020. Assigned Commissioner Ruling Temporarily Suspending Renewal Requirements for 90 days due to the COVID-19 pandemic.

[5] D. 20-11-006

- **Makeup for Federal Subsidy Reduction** – Extended the authorization for the California LifeLine fund in D. 21-09-023 to make up for the loss of federal funding for participants who qualify under California (but not federal) eligibility requirements.
- **LifeLine Assessment** – Contracted with California State University, Sacramento to conduct a Program assessment to focus on market competition, process evaluation, and program awareness. Work began in December 2020 and will conclude by the first quarter 2022.

Program Overview

1. **Mission/Goal**: To provide high quality affordable basic residential telephone service to the greatest number of California low-income households.
2. **Enabling Legislation**: the Moore Universal Telephone Service Act enacted by the Legislature In 1983.
3. **Governing Law**: Public Utilities Code § 871 *et seq*.
4. **Program Rules and Requirements:** Rules and requirements are found in various CPUC decisions, orders, resolutions, and General Order 153.[6]

In 1983, the Legislature enacted the Moore Universal Telephone Service Act (Moore Act),[7] to provide low-income households with access to affordable basic residential telephone service. Assembly Bill (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.

In 1984, through D. 84-04-053, the CPUC established California LifeLine (formerly known as the Universal LifeLine Telephone Service Program) to lower the cost of eligible households' monthly phone bills. The CPUC administers the Program in accordance with the Moore Act and the Federal Communications Commission's (FCC) federal Lifeline program regulations.

For the first 30 years, the program provided consumer discounts for home wireline phone service. Since 2010, the program has ensured that participants basic communication needs have been met. The Commission expanded the program in 2014 to promote competition and provide market choices to consumers, to include wireless telephone service providers in response to demand among low-income households for affordable wireless telephone service. The Commission also established minimum service standard requirements in 2020 including an increase in the mobile data allowance to reflect a rise in the communication needs of participants.

As of June 30, 2021, over 1.3 million qualifying California households participated in the program. Of these, approximately 82% of participants had wireless services and 18% had wireline services. The increase in new applications following the introduction of wireless LifeLine in 2014 reflects demand among low-income households for wireless telephone service at affordable rates. As of June 2021, there were 13 wireless and 39 wireline telephone service providers authorized by the Commission to participate in the California LifeLine Program.

The LifeLine program has become an important means of achieving universal service by making residential service affordable to low-income California households through the creation of a LifeLine class of service.[8]

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6 https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M421/K790/421790945.pdf

7 *See* Public Utilities Code (Pub. Util. Code) sections 871 et al.

8 *See* Pub. Util. Code § 871.7(a).

A. Population Served

Applicants may qualify for the California LifeLine Program in two ways: (1) Program–based eligibility, enrolling in an eligible public assistance program or (2) Income-based eligibility, meeting the required income threshold.[9] More than 95% of participants qualify through program-based eligibility.

1. Program-based: Under program-based eligibility, households may qualify for the California LifeLine discounts if they provide documentation that at least one household member is enrolled in one or more eligible public-assistance programs.

Eligible public-assistance programs currently include the following:

- Medicaid/Medi-Cal
- Low Income Home Energy Assistance Program (LIHEAP)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance or Section 8
- CalFresh, Food Stamps or Supplemental Nutrition Assistance Program (SNAP)
- Women, Infants and Children Program (WIC)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)
- California Work Opportunity and Responsibility to Kids (CalWORKs)
- Tribal Temporary Assistance for Needy Families (TANF) Bureau of Indian Affairs General Assistance

2. Income-based: Under income-based eligibility, households with total annual gross income at or less than approximately 150 percent of the Federal Poverty Level are Program eligible. The Commission annually adjusts income thresholds, effective June 1 of the year, to reflect inflation based on the Federal Consumer

[9] D. 17-01-032, issued January 25, 2017, revised the California LifeLine income-based criterion to 135 percent of the Federal Poverty Level and eliminated some of the qualifying programs for California LifeLine to align with the FCC Lifeline program rules. The Commission later issued D. 18-02-006 on February 9, 2018, to restore the eliminated programs to the list of qualifying programs and restore income-based eligibility for the California LifeLine Program to at or below 150 percent of the Federal Poverty Level. These changes to the eligibility criteria are effective indefinitely or until another Decision is issued.

Price Index.[10] Table 1. Income-based Qualification Eligibility lists the annual income limits effective in Fiscal Years 2019–20, 2020–21 and 2021-22.

Table 1. Income-based Qualification Eligibility

Household Size	Annual Income Limit 2019 - 2020	Annual Income Limit 2020 - 2021	Annual Income Limit 2021 - 2022[11]
1 -2	$27,500	$28,700	$28,500
3	$31,900	$32,600	$33,100
4	$38,800	$39,700	$40,300
Each Additional Member	$6,900	$7,100	$7,200

B. Participant Statistics

Pursuant to subdivision (a)(4) of Section 873 of the Public Utilities Code, shown below in the following tables are program participation levels for California Households from 2019 – 2020. Approximately 95 percent of applicants qualified through program-based eligibility. The remaining 5 percent qualified under a total annual gross income at or less than approximately 150 percent of the Federal Poverty Level.

Each table shows the aggregate number and percentage of all participating households in the State as well as participation levels for the top six California counties in the following categories:

1) Participants as a Percentage of Households
2) Rural Participants
3) Veterans
4) Age 65 or greater.

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[10] *See* the Commission's GO 153, section 5.2.1: The income limit is calculated by applying the previous income limits for the different household sizes and multiplying it by the Consumer Price Index for all Urban Consumers (CPI-U) rate. The Commission obtained the CPI-U rate from the U.S. Department of Labor, Bureau of Labor Statistics, Economic News Release, available at http://www.bls.gov/news.release/cpi.toc.htm.

[11] The Household Income Limitation beginning June 1, 2021, through May 31, 2022, for household size 1-2, was reduced from the June 1, 2020, to May 31, 2021, period. Commission staff determined the CPI-U increase had been miscalculated, resulting in an overstatement of the income limitation. Correcting the income limitation amounts for the correct CPI-U, 2.3%, instead of 4.5% for 2021-2022 period, and applying the 1.4% CPI-U increase for this period, resulted in income limits lower than the previous level.

Overall, LifeLine program participants represented 10.7 percent of all California Households, Rural participants represented 3.2 percent, veterans represented 0.1 percent and participants 65 and older represented 28.2 percent. Participation statistics for all 58 California counties are listed in Appendix A at the end of the report.

Table 2. LifeLine Participants as a Percentage of California Households

County	Total Households	Total Participants	Percent of Households
California	**13,085,036**	**1,398,040**	**10.7%**
Los Angeles	3,350,389	435,935	3.3%
San Bernardino	637,569	101,501	0.8%
San Diego	1,134,032	96,352	0.7%
Riverside	725,160	85,736	0.7%
Orange	1,046,676	80,335	0.6%
Sacramento	526,804	69,302	0.5%

Table 3. LifeLine Rural Participants

County	Rural Area Participants	Percent of Total Participants
California	**44,650**	**3.2%**
San Bernardino	4,296	0.3%
Fresno	3,920	0.3%
Riverside	3,443	0.2%
Kern	2,734	0.2%
Tulare	2,281	0.2%
Madera	1,820	0.1%

Table 4. Veteran LifeLine Participants

County	Veterans	Percent of Total Participants
California	**1,512**	**0.1%**
Los Angeles	315	0.0%
San Diego	227	0.0%
San Bernardino	127	0.0%
Riverside	111	0.0%
Sacramento	97	0.0%
Orange	65	0.0%

Table 5. Age 65 and Older Participants

County	Age ≥ 65	Percent of Total Participants
California	**394,786**	**28.2%**
Los Angeles	138,302	9.9%
San Diego	28,216	2.0%
Orange	27,278	2.0%
San Francisco	20,728	1.5%
San Bernardino	19,609	1.4%
Riverside	18,760	1.3%

C. Service Provided

California LifeLine participants receive the following discounted home phone services:

- Monthly flat rate service discount of up to $14.85[12]
- Monthly cell phone service discount of up to $14.85[13]
- Service connection discount of up to $39
- Exemption from public purpose program surcharges, CPUC's user fee, federal excise tax, local franchise taxes, and State 911 tax associated with phone service
- Discounts on two telephone lines if a customer uses a teletypewriter (TTY) or is enrolled in the Deaf and Disabled Telecommunications Program. If a customer uses a TTY, the customer must have immediate and continuous access to it.

In response to FCC Order 16-38 aiming to modernize the Federal Lifeline program, the Commission authorized the program to temporarily replace $2 per month of reduced federal support for wireline participants with a $2 state supplement. In October 2020, the Commission adjusted wireless minimum service standards improving broadband offerings to meet the LifeLine participants' need for distance learning, telehealth, and other essential needs.

D. Program Administration

The Commission administers the Program in accordance with the Moore Act and the Lifeline Program regulations of the FCC. From 1984 to 2004, the telephone corporations that were California LifeLine service providers performed the enrollment responsibilities. In 2005, the Commission transferred the enrollment functions from the telephone corporations to a Third- Party Administrator (TPA).[14] Under the Commission's oversight and supervision, the TPA (presently Maximus, Inc.) is responsible for all aspects of the LifeLine program and handles the application, enrollment, and renewal processes and determines customer eligibility to enroll in the California LifeLine Program, including:

- Determining the eligibility of households for the LifeLine program, including enrolling, approving, and denying customers; Operating and monitoring dynamic and responsive Information Technology (IT) systems that support the flow of information between Contractor, customers, California LifeLine Service Providers, and CPUC staff.

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[12] Does not account for Extended Area Service rates, which provides a higher level of support.

[13] For cell phone plans with at least 1,000 voice minutes, which may include domestic messaging or text, the monthly discount is $14.85.

[14] The Commission uses the state's competitive bidding process to acquire a contractor to perform the TPA's functions.

- Providing a dynamic, responsive, and comprehensive customer service solution which includes a call center, Toll-Free service lines, Interactive Voice Response (IVR) system, and website.
- Performing records and database management.
- In alignment with the Inter-Agency Agreement between CPUC and Department of General Services (DGS), Office of State Publishing (OSP), coordinating, communicating, and collaborating with the OSP for outbound printing and mailing of program documents.
- Processing inbound mail documents.
- Preventing waste, fraud, and abuse of the LifeLine program.
- Complying with federal and state regulations affecting universal service programs; and
- Communicating and interacting with internal and external stakeholders.

E. Annual Renewal Process

California LifeLine participants must also annually renew their eligibility to continue participating in the program. There are four ways participants can renew: (1) mail; (2) the CPUC Web Enrollment System (WES), which is located on the public website; (3) over the telephone, including using the Interactive Voice Response (IVR) system; and (4) using a service provider's approved website platform.

F. Renewal Working Group Activity

To improve renewal rates and processes for Program participants, the Commission in 2020 established a LifeLine Renewal Working Group (RWG). The RWG[15] includes eight representatives from consumer advocate groups, wireline, and wireless eligible telecommunication carriers. The RWG charter is to review the current LifeLine Program renewal process and evaluate strategies and initiatives to improve the process.[16] As directed, the RWG filed a Final Proposal (Proposal) for Improving the LifeLine Renewals Process on February 5, 2021.[17]

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[15] Assigned Commissioner's Scoping Memo and Ruling, April 13, 2020. https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=332175052

[16] LifeLine Renewal Working Group. Final Proposal for Improving the Renewal Process, February 5, 2021, p. 1 https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=366583872

[17] Status Update Report of the Renewal Working Group, December 11, 2020, and Final Proposal submitted by the Lifeline Renewal Working Group on February 5, 2021. https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=355438498

https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=366583872

On December 15, 2021, the Commission issued for comment the RWG Proposal staff analysis and recommendations[18] along with an evaluation of compliance with Assembly Bill 74.[19] AB 74, enacted on September 30, 2021, requires the Commission before March 1, 2022, "shall, as part of an existing proceeding, adopt updated rules for the lifeline program establishing a modified recertification process that minimizes barriers to lifeline subscriber recertification and reduces the burden and cost of recertification on the lifeline program". Comments on the Staff analysis were due January 14, 2022, and replies were due January 28, 2022. A follow-up workshop may be conducted later in 2022 to discuss further improvements to the renewal process.

[18] https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M431/K807/431807365.PDF

[19] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB74

Pilots and Partnerships

Consistent with Pub. Util. Code Section 871.7 (a), the Commission adopted criteria for pilot programs on April 25, 2019. Two pilot proposals met the criteria and the Commission launched two pilot programs with Boost Mobile.[20]

A. iFoster Pilot

The iFoster pilot launched in November 2019. Boost Mobile partnered with iFoster, a Truckee-based non-profit serving foster youth across the state and country, to provide free mobile/wireless phone and data service and free smartphones. As of June 30, 2021, the iFoster pilot had over 11,000 participants.

In September 2020, iFoster identified that foster youths' needs for broadband services increased because of the COVID-19 pandemic. iFoster submitted a Petition for Modification requesting a reallocation of unspent funds approved in D. 19-04-021 to increase pilot participants' data allowances. On November 5, 2020, the Commission approved the Petition for Modification, and in December 2020 approved a data allowance upgrade from 3 GB to 47 GB, and a $15 cost increase from $25 to $40.

The Commission issued an Evaluation Report in April 2021 recommending an extension of the pilot for an additional 14 months from the November 2021 conclusion date to the end of January 2023. A subsequent Decision, D. 21-07-008 issued on July 15, 2021, extended the pilot conclusion date to January 31, 2023, authorized the program to provide a monthly service plan subsidy of up to $25 per participant, and required the Commission's Communications Division to develop a plan to enable California's foster youth to participate in the general Program beginning February 1, 2023. The Commission's Communications Division is examining how to include foster youth in the general Program, including changes to GO 153, and plans to host a workshop to discuss the proposal.

B. CARE Pilot

The CARE pilot launched in July 2019 and provided CARE recipients discounted mobile/wireless phone and data service provided by Boost Mobile. Participation rates were lower than expected, and additional outreach efforts were interrupted by COVID-19. In March 2021, the Commission issued an Evaluation Report recommending the conclusion of the CARE Pilot because it did not meet the goals of the pilot program or its stated objectives. The pilot was terminated effective July 1, 2021.

[20] D. 18-12-019

Key Initiatives

G. COVID-19 Related Initiatives

- Suspension of Program Renewal Process - Renewal Freeze

The California LifeLine and Federal Lifeline program policies are aligned to leverage resources and maximize participants' benefits. The Commission mirrored the FCC's Renewal Freeze Order and suspended renewals starting in March 2020. On March 19, 2020, in response to the COVID-19 pandemic, the assigned Commissioner issued a ruling to temporarily suspend renewal requirements and non-usage rules.[21] This Ruling followed Governor Newsom's Executive Order N-29-20 and the FCC's Order DA 20-285, which suspended renewals for Californian public assistance programs and federal Lifeline respectively. Following public comment, the Commission formalized these protections in D. 20-05-043 and stated that the Renewal Freeze could be extended, as necessary, to mirror the policies of other state public assistance programs and the FCC. The Renewal Freeze and the waiver for non-usage rules were extended by both the FCC and the CPUC in August and November 2020.

On February 24, 2021, the FCC issued Order DA 21-229, which extended through June 30, 2021 the suspension of the federal Lifeline program's renewal process. Order DA 21-229 also extended the suspension of the federal Lifeline program's de-enrollments for non-usage rule through May 1, 2021 but declined to further extend the suspension of de-enrollments for non-usage beyond May 1, 2021. In a Ruling on February 25, 2021, the assigned Administrative Law Judge extended California's suspension of Program de-enrollments for non-usage through April 30, 2021 and extended the suspension of the Program renewal process through June 30, 2021. In May 2021, when the non-usage rules were restored, the Commission processed removals for roughly 600,000 participants who had not used their phones for 45 days.

The Renewal Freeze was extended two more times. First through December 31, 2021, per FCC Order DA 21-1191 and a September 23, 2021, Judge's Ruling and again through March 31, 2022, per the FCC December 30, 2021 Order DA 21-1650 along with a January 3, 2022 Judge's ruling. Since March 2020, new applications processed by the TPA have fallen below their 2018-19 levels, and new application processing will remain low at least until the Renewal Suspension expires, causing applications received and processed to decrease to 1.6 million in 2020-21.

H. California State University Program Assessment Project

A 2019 Legislative Analyst's Office (LAO) Report called for the CPUC to conduct an external evaluation of the California LifeLine Program with the goals of increasing enrollment and renewal rates and improving the

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[21] If a participant does not use their service for 30 days, their service provider must notify them that they are at risk of losing their service/discount. If the participant does not use the service in the next 15 days after the notification, then they will be removed from the program. This applies to pre-paid Lifeline wireless plans that have a $0 co-pay to customers.

accuracy of caseload estimates. The Commission entered into a contract with the California State University, Sacramento (CSUS) to conduct the Assessment. Work on the Assessment began December of 2020 and concludes in the first quarter 2022.

- To date, CSUS has completed the following throughout the State of California:
  - 85 stakeholder interviews
  - 8 focus groups comprised of a total of 40 individuals (English, Mandarin & Cantonese)
  - Conducted online statewide survey of roughly 4,000 wireless LifeLine customers
  - Conducted online survey of roughly 180 LifeLine and potential LifeLine customers via LifeLine website
  - Completed telephone survey of roughly 250 wireline LifeLine customers
- The Assessment includes:
  - Identifying the factors impacting participation in the LifeLine program
  - Making recommendations to the CPUC with possible strategies to increase LifeLine reach to low-income households
  - Providing necessary information to the CPUC for future LifeLine analyses and modifications
  - Fulfilling the LAO recommendations:
    - **Market Competition** – Research and analyze market competition.
    - **Process Evaluation** – Evaluate the Program's renewal and enrollment processes.
    - **Program Awareness** – Assess the level of Program awareness.
    - **Program and Policy** – Examine and consider shifts in Federal and State policy and program.
- The Assessment deliverables:
  - CSUS will deliver to the CPUC a report with recommendations addressing the areas of the Assessment focus: Market Competition, Process Evaluation, Program Awareness and Program and Policy along with a Final Report and recommendations in the second quarter 2022.

I. Extension of the iFoster Pilot and Implementing LifeLine Categorical Eligibility for Foster Youth

In D. 19-04-021, the Commission authorized the iFoster Pilot with the objective of lowering barriers to California LifeLine participation for California foster youth.[22] The iFoster pilot was scheduled to conclude at the end of November 2021, but on July 15, 2021, the Commission in D. 21-07-008 extended the iFoster

[22] D. 27-07-008 at 7 and D. 19-04-021 at 37.

pilot program through January 2023.[23] D. 21-07-008 also authorized the Program to provide a monthly service plan subsidy of up to $25 per participant. The extension was authorized without increasing the pilot program budget, which currently is $184,200,000.

Additionally, D. 21-07-008 directed the Commission's Communications Division to (1) develop a plan to enable California's foster youth to participate in the general LifeLine Program beginning no later than February 1, 2023, and (2) during the second quarter of 2022, propose how to include foster youth in the general Program and host a workshop to discuss the proposal. The workshop took place in October 2021 and Staff is currently working to develop a plan to incorporate the iFoster pilot into the general California LifeLine Program.

J. Qualifying Program Database Access for Eligibility Verification

Access to qualifying program databases enables accurate identification and eligibility confirmation for the majority of LifeLine renewing participants. California participants may qualify for the LifeLine program in two ways, program-based or income-based. Most participants qualify because of their enrollment in a qualifying federal or state program. As shown in Figure 1. LifeLine Enrollment Eligibility Method - Program and Income (by rolling 12 months), as of November 2021, 97.95 percent of LifeLine enrollment is "program-based" eligible compared to only 2.05 percent "income-based" enrollment.[24] Figure 2. Program-based Eligibility Breakdown shows the qualifying programs in California with the highest percentage of LifeLine subscribers are CalFresh (SNAP) and Medi-Cal. Together, CalFresh and Medi-Cal represent 98.6 percent of program-based enrollment with CalFresh representing 55.6 percent, and MediCal representing 43.0 percent respectively. Women Infants and Children (WIC), Supplemental Security Income (SSI), Section 8 (S8) and other programs combined, represent 1.21 percent of enrollment. Getting access to consumer information from these program databases has the highest potential for streamlining enrollment and renewals for LifeLine participants.

[23] D. 27-07-008 at 14

[24] California LifeLine Administrator, "Presentation to the ULTS Administrative Committee," June 8, 2021, p. 12.

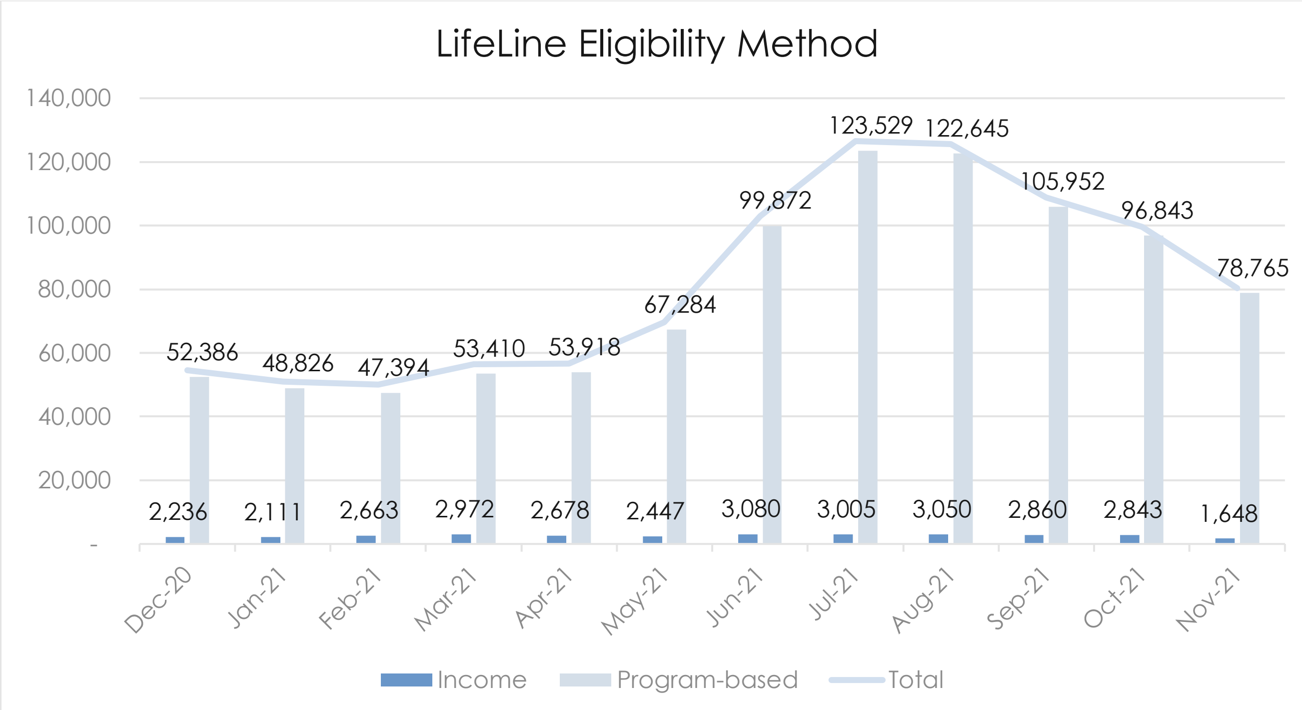

Figure 1. Enrollment Eligibility Method - Program and Income (by rolling 12 months)

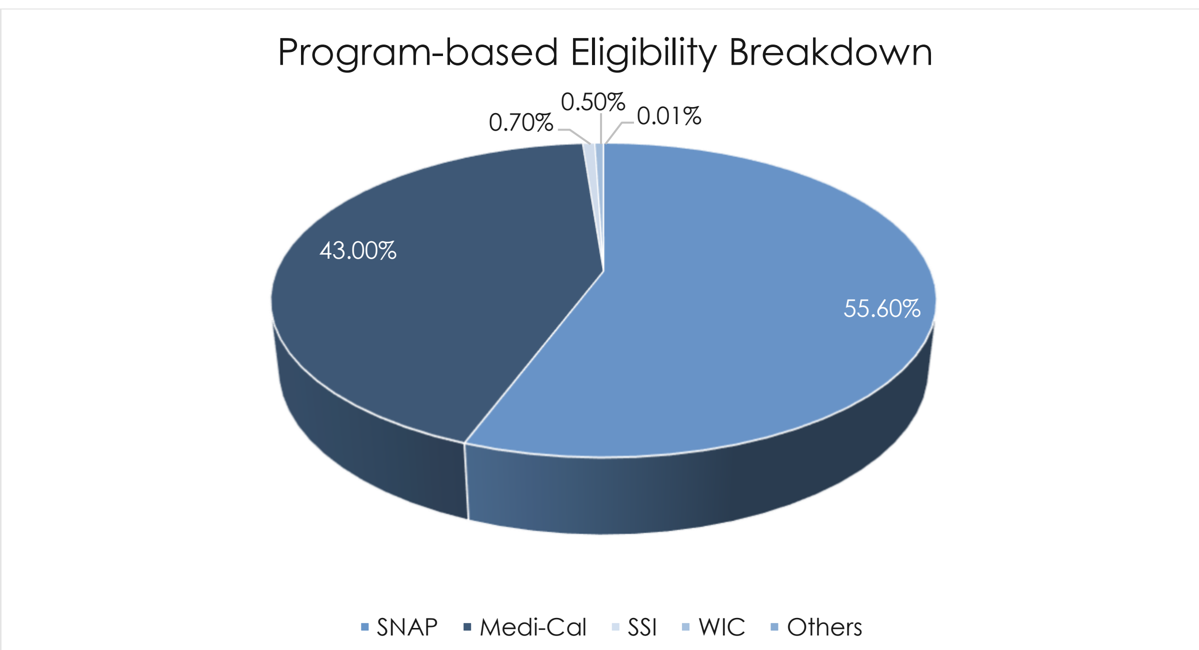

Figure 2. Program-based Eligibility Breakdown

The California LifeLine program is making improvements to its renewal and application processes. The CPUC and the California Department of Social Services (CDSS) recently executed an interagency agreement that paves the way for the California LifeLine program to utilize CDSS' new "CalFresh Confirm" solution to confirm CalFresh participation, and thereby, makes automated eligibility determinations for LifeLine. CalFresh Confirm consolidates SNAP participation data from 58 California counties that is refreshed weekly into one access point for partners that serve similar populations. All stakeholders benefit from implementing the CalFresh Confirm solution because it:

- Improves the subscriber experience during the renewal process
- Lowers the costs to ratepayers and the LifeLine Fund
- Simplifies the process for service providers and lowers the risk of approving ineligible subscribers
- Reduces the incidence of waste, fraud, and abuse

The CPUC is currently in a testing environment with CalFresh, and preliminary results indicate that the CalFresh participation match rate of the California LifeLine subscriber sampling is 40%. The objective is to expand this data-matching process with other eligible programs in the future to increase the number of Californians participating in the Program and increase Program efficiency.

Other Initiatives

A. Web Enrollment System (WES) and Online Renewal Portal

Modernizing the public online application and renewal portal and enhancing its functionality to improve the user experience has a positive impact overall on the LifeLine enrollment as well as the renewal process and rate. A modern website also offers more opportunity to test and implement new processes and procedures for consumer renewals. CPUC staff is currently in discussions with the Office of Digital Innovation (ODI) about short-term improvements to the online renewal website and longer-term discussions about the steps and resources required to implement a portal like California Employment Development Commission (EDD) and CalFresh (SNAP) where users establish an account on the organization's website, eliminating the need to use PIN numbers for online authentication and identification.

In anticipation of the renewal resumption, the TPA made improvements to the presentation of the renewal form in the public LifeLine website. The renewal form is now more user-friendly with a "mobile first" approach. The enrollment form is presented as a digital representation of the paper form and appears within the window of the user's device. It no longer includes page breaks nor requires the user to scroll to the far left or right of the screen to complete the requested information. Additionally, Adobe Analytics has been implemented for the public website and enrollment process to track and capture usage data such as the number and type of visits and page level traffic counts.[25] Other suggested improvements include changing the presentation format of the renewal process on the website to enhance the user experience.

B. Improve Third Party Administrator (TPA) Communication with Subscribers

Increasing communication with consumers during the renewal process improves the likelihood of subscribers responding to and successfully completing the renewal process. The TPA is implementing upgrades for the renewal resumption and will be able to measure the benefits of these approaches. These upgrades include:

- Targeted Interactive Voice Response (IVR) messaging to subscribers approaching their renewal window encouraging them to renew on-line or by contacting the call center.
- Additional Short Message Service (SMS) messaging to subscribers in the renewal process encouraging them to renew on-line or with the call center.
- Re-ordering of IVR presentation of qualifying public assistance programs to present first federal programs, then state programs and in order of frequency selected to ensure that California LifeLine subscribers

[25] LifeLine Renewal Working Group. Final Proposal for Improving the Renewal Process, February 5, 2021, p. 3.

receive the applicable and appropriate California and federal discount amounts when selecting their qualifying public assistance programs.

- Providing Wireless service providers renewal status information for prospective consumers.
- Improving the consumer experience related to the use of PIN numbers in the renewal process. The current renewal process requires a unique PIN number be assigned to each subscriber. Changes were implemented to make it easier to retrieve or change a PIN number and reduce subscriber frustration and improve renewal completion rate. These changes include:
  - » Subscriber PIN setup upon handset activation (Subscriber can create a unique personalized PIN number)
  - » PIN set up for existing subscribers
  - » Subscriber initiated on-demand PIN request via text messaging
- The Direct Application Process (DAP) CheckCustomerStatus method has been enhanced. When a wireless service provider checks with the TPA to determine if a participant will be treated as a new enrollee or as a transfer customer, if the participant is in the renewal process with a pending response form, the service provider will be alerted. This change addressed concerns raised by wireless service providers that they lacked visibility into the renewal status of subscribers transferring from other service providers.
- Providing Service Providers a new way to submit a subscriber's renewal – SPIA. Service Providers who integrate the new Service Provider Intake API (known as SPIA) will be able to electronically submit the data for the renewal form to the TPA. The TPA will populate the renewal form and submit it directly into the review queue. SPIA is available to wireless and wireline service providers.

Key Legislative Actions

A. Assembly Bill No. 74 (Gonzalez, 2021).[26]

- The bill requires the Commission, before March 1, 2022, to adopt updated rules for the LifeLine program establishing a modified recertification process that minimizes barriers to LifeLine subscriber recertification and reduces the burden and cost of recertification on the LifeLine program.
- A Proposed Decision was published in March 2022.[27]. Based on stakeholder comment and Commission staff analysis, this Proposed Decision finds that some sections of AB 74 were already completed or are currently in progress. The Proposed Decision also adopts other improvements to address the remaining items to comply with AB 74.

B. Senate Bill No. 394[28]

- The bill revised the definition of "household" and allowed multiple LifeLine telephone service subscribers to maintain the same address if they are not members of the same household.
- The CPUC has updated its Program rules to reflect the new definition for "household."

[26] Act to add Section 878.6 to the Public Utilities Code, relating to communications. Approved by the Governor on September 30, 2021. See https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB74

[27] Proposed Decision Regarding Renewals Process Improvement and Compliance with Assembly Bill 74. See https://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=461182221

[28] Act to amend Section 878 of, and to repeal Section 872 of, the Public Utilities Code, relating to telecommunications. Approved by the Governor on October 9, 2021, See https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB394

Federal Communications Commission Order to Modernize the Lifeline Program

On April 27, 2016, the FCC issued order FCC-16-38[29] that expanded the services funded by the federal Lifeline program to include broadband internet services while setting minimum service standards for all federal Lifeline funded services. The minimum standards have increased, while support levels for services that do not meet them have declined. Additionally, the FCC adopted administrative changes for the federal Lifeline program such as: 1) establishing a national entity (the National Verifier) to determine eligibility for federal Lifeline participants, 2) limiting the federal Lifeline eligibility criteria, 3) adopting defined durations for benefit port freezes, and 4) revising the de-enrollment for non-usage rules.

In February of 2018, the Commission issued D. 18-02-006 to implement California-only eligibility criteria restoring the more-inclusive list of qualifying public assistance programs and the income criterion of 150 percent of the Federal Poverty Level. D. 18-02-006 also authorized the California LifeLine Program fund to temporarily make up for loss of federal funds for participants who only qualify under California-only eligibility criteria but who do not meet federal Lifeline eligibility criteria. Authorization to replace federal support for California-only participants was extended indefinitely in D. 20-02-042 and authorization to replace federal support for wireline participants was extended to November 30, 2020, in D. 20-02-004.

Beginning December 1, 2019, the FCC reduced federal Lifeline monthly support levels for service plans that do not meet the minimum broadband standards by $2.00, from $9.25 to $7.25, and reduced them by another $2.00 to $5.25 on December 1, 2020. D. 20-02-004 authorized the program to replace the $2.00 per month of reduced federal support for wireline participants from December 1, 2019, through November 30, 2020. On October 8, 2020, the Commission issued D. 20-10-006, which maintains the $2 make-up for voice-only wireline service after December 1, 2019. For wireless LifeLine, the Decision implemented a Minimum Service Standard of 4GB of data per month for an SSA of $12.85, and a Minimum Service Standard of 6GB per month for an SSA of $14.85. Lowering the SSA for plans that do not meet the Minimum Service Standards to $12.85 may modestly reduce Program expenditures, but the Commission does not have data at this time to estimate by how much.

On November 5, 2021, the FCC issued Order DA 21-1389 extending 2020 subsidy levels and minimum service standards for one additional year, to December 1, 2022.

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[29] Full text is available at https://www.fcc.gov/document/fcc-modernizes-LifeLine-program-low-income-consumers.

On December 27, 2020, Congress authorized $3.2 billion in funding for a program called the Emergency Broadband Benefit (EBB), administered by the FCC. All LifeLine subscribers were eligible for a $50 per month benefit provided by the federal government. Since May 2021, LifeLine has implemented rules allowing service providers to extend EBB benefits to LifeLine consumers, which are saving the Program approximately $4 million per month.

Universal LifeLine Telephone Service Trust Administrative Committee[30]

The Universal LifeLine Telephone Service Trust Administrative Committee (ULTS-AC or Committee) is an advisory Board to the California Public Utilities Commission (CPUC)[31] regarding the development, implementation, and administration of the Universal Lifeline Telephone Service Trust (ULTS) program to ensure LifeLine telephone service is available to the people of California as provided by the Moore Telephone Service Act. [32]

A. Statement of James Ahlstedt, Chairperson of ULTS-AC

"The importance of the ULTS-AC's mission to provide the CPUC with stakeholder input and oversight of the administration of the ULTS program cannot be understated. The ULTS-AC has the distinct opportunity and obligation to advise the CPUC on how best to administer the ULTS program by regularly assessing the program's status and identifying critical areas for improvement. To accomplish these tasks the ULTS-AC meets regularly to review data relevant to the ULTS program including presentations from the ULTS's Third Party Administrator (TPA) and from CPUC staff in Communications Division, Fiscal, and the Consumer Affairs Branch.

The composition of the ULTS-AC's members allows for a diverse set of viewpoints all focused on improving the ULTS program and is a major contributing factor to the ULTS-AC's ongoing success. Representatives from LifeLine providers, community-based organizations, and consumer advocacy groups come together as members of the ULTS-AC with a single goal of advising the CPUC on how best to improve the ULTS program. While the CPUC's ongoing LifeLine modernization Rulemaking, R.20-02-008, provides stakeholders the opportunity to weigh in on specific issues brought to the table by the Assigned Commissioner and Assigned Administrative Law Judge, the ULTS-AC gives stakeholders a vehicle to influence which issues are addressed in the first place. This critical stakeholder engagement is a core function of the ULTS-AC and one that the UTLS-AC wishes to explore further in the future.

In addition to shaping the direction of the ULTS program, the ULTS-AC provides an important layer of oversight on all aspects of the ULTS program, especially program administration. Again, while R.20-02-008 may address important policy issues in the ULTS program, there is a limit to how much the CPUC's rulemaking process can control day-to-day program administration and implementation. With this in mind,

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[30] See ULTS-AC Charter: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/lifeline/ultsac/ults-ac-charter.pdf

[31] Pursuant to PU Code § 277(a)

[32] Universal LifeLine Telephone Service Trust Administrative Committee Charter, p.1

the ULTS-AC serves as a venue for stakeholders to look behind the scenes and identify any and all issues with the ULTS program's administration. This oversight functionality also helps to ensure that ULTS program funds are prudently used and that the ULTS program is administered consistent with appropriate Public Utilities Codes and Commission Decisions.

Overall, the ULTS-AC is a vital part of an increasingly important public purpose program, the ULTS program. The ULTS-AC will continue to advise the CPUC regarding the continued development and improvement of the ULTS program so that all Californians have equal access to high-quality, affordable voice and broadband services into the future."

B. Meetings

The Committee meets at least quarterly. All meetings are open to the public and held in accordance with the provisions of the Bagley-Keene Open Meeting Act.[33]

C. Membership

The Committee is composed of eleven (11) members, consisting of representatives from a large or mid-sized local exchange carrier (LEC); a small LEC; an inter-exchange carrier, competitive local exchange carrier (CLEC); a wireless carrier; two consumer organizations, each of whom represent a different constituency, based on geographic or economic criteria, on language, or on other criteria which reasonably influence lack of access to basic telephone service – or one consumer based organization and a state agency with universal service expertise; three community based organizations (CBOs) each of whom represents a different constituency, based upon geographic or economic criteria, on language, or other criteria which reasonably influence lack of access to basic telephone service; an individual or organization representing the interests of either the deaf/hearing impaired or disabled users of the ULTS program; the Commission's Public Advocates Office.

Each position has a designated alternate authorized to assume the responsibility of the position in the absence of the primary member. Active Committee membership as of September 30, 2021, includes nine primary and four alternates. Two CBO positions are open. Refer to Table 2. ULTS–AC Membership Roster 2021 for a list of members and alternates.

D. Goals and Objectives

1. Meet quarterly under the Provisions of Bagley-Keene Open Public Meeting Act
2. Follow procedures mandated by Charter
3. Provide recommendations to CD on ways to improve Lifeline Program
4. Monitor and evaluate CBO education and outreach

[33] Government Code §§ 11120 - 11133

5. Monitor legislative, CPUC and FCC activities that may impact California LifeLine program or consumers in California
6. Submit yearly California LifeLine budget for review and approval by Commission resolution

E. ULTS-AC Accomplishments

Nine meetings were held from July 2019 through September 2021. Three meetings were held in person and six meeting were held virtually due to COVID-19 safety guidance protocol.

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

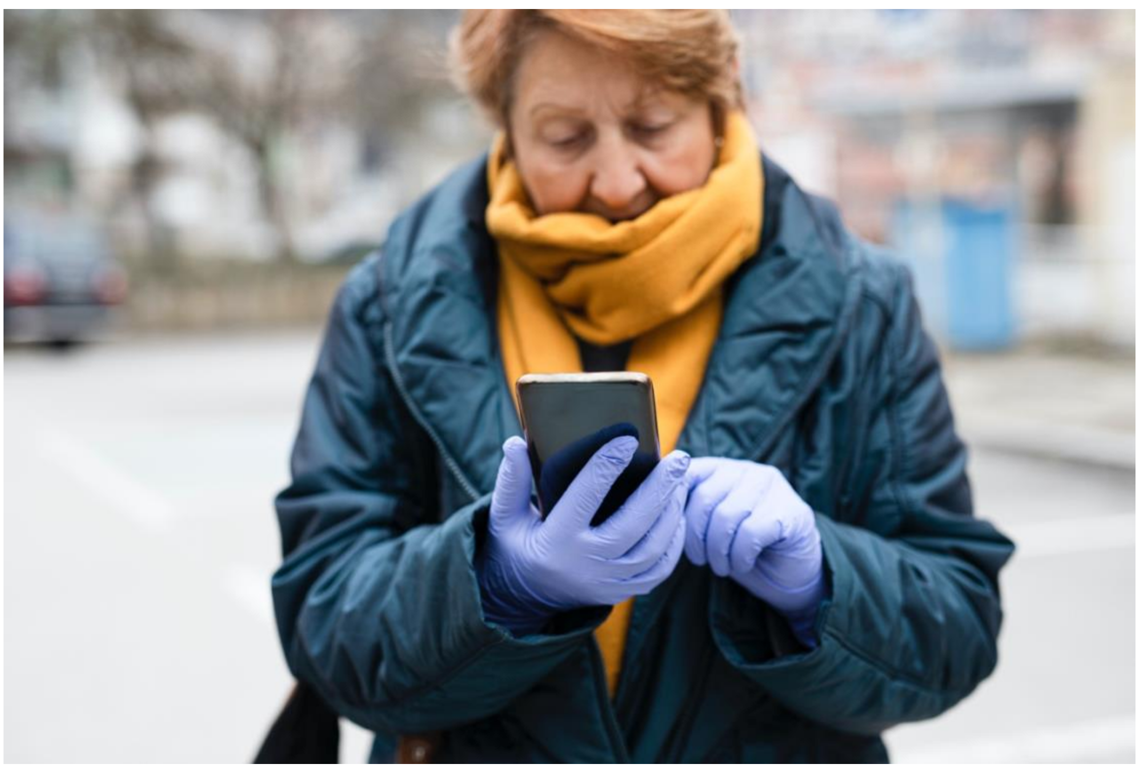
- Submitted annual budgets
- Provided advice to the Communications Division on California LifeLine contractors
- Reviewed and monitored program expenditures and surcharge income
- Provided feedback to the call center contractors
- Provided feedback to CD staff regarding changes in the California LifeLine program

The ULTS-AC provides an important vehicle for the CPUC to receive information from service providers, consumer groups and community organizations who are key to the provision of the LifeLine program.

Table 6. ULTS-AC Membership Roster 2021

Representing	Role	Member	Company
Large ILEC	Primary Alternate	Michael Foreman Charlie Born	AT&T California Frontier Communications
Small ILEC	Primary Alternate	Linda Lassen (vacant)	Sierra Telephone
CLEC	Primary Alternate	Marcie Evans (vacant)	Cox Communications
Wireless	(Vice Chair) Primary Alternate	David Avila Alex Gudkov	TracFone Wireless, Inc. Uconnect
Deaf/Hearing Impaired or Disabled Rep	Primary Alternate	Kate Woodford Brian Winic	Center for Accessible Technology CA Dept. of Rehabilitation

Consumer	Primary Alternate	Ken McEldowney (vacant)	Consumer Action
Consumer	Primary Alternate	Vinhcent Le (vacant)	Greenlining Institute
CBO	Primary Alternate	Cesar Motts (vacant)	Southeast Community Development Corp
CBO	Primary Alternate	(vacant) (vacant)	
CBO	Primary Alternate	(vacant) (vacant)	
CPUC's Public Advocates Office	(Chair) Primary Alternate	James Ahlstedt (vacant)	Public Advocate's Office



LifeLine Fund Expenditures and Fund Balance

The Legislature established a permanent program funding source with a surcharge on service rates for telephone service provided by telephone corporations operating between service areas.[34] California LifeLine Program Fund revenue and expenses consist primarily of the following:

A. Revenue

- Regulatory Fees: Program revenue from funds received from a LifeLine program surcharge, as determined by the CPUC, which appears at the bottom of a user's telephone bill for intrastate telecommunications services. The surcharge rate of fiscal years 2019-20 and 2020-21 was 4.75 percent.
- Investment Income**:** income from investment of surplus funds
- Other Transfers and Adjustments**:** revenue transfers from other accounts

B. Expenses

- Local Assistance: reimbursement of carriers (claims) for providing California LifeLine Services to program participants. These costs consist of surcharges and taxes, connection or conversion charges, and a Specific Support Amount, or SSA, for the monthly recurring charge. Participating service providers may also recover administrative costs and implementation costs on a limited basis.
- State Operations: staff salaries and benefits, California LifeLine Third Party Administrator (TPA), Office of State Publishing, and other costs such as Administrative Committee-related costs, Program needs assessment, travel, advertising, goods, training, and office equipment.

[34] *See* Pub. Util. Code § 879.5.

C. LifeLine Fund Balance

Table 7. California LifeLine Program Enacted State Budget and Fund Balance – FY 2019-20 and 2020-21

California LifeLine Program Enacted State Budget and Fund Balance FY 2019-20 and 2020-21		
	FY 2019-20	**FY 2020-21**
Enacted Budget	$453,731	$403,540
BEGINNING BALANCE	$486,961	$385,007
Revenues, transfers, and adjustments	$431,442	$19,822
Total Resources	$918,403	$404,829
EXPENDITURES		
State Operations	$27,681	$28,139
Local Assistance	$426,050	$375,401
Other	$1,408	$1,155
Total Expenditures	$455,139	$404,695
FUND BALANCE	$463,264	$134
In thousands of dollars		

Source: FY 19-20 – Enacted budget as of 6.27.2019 Department Report (ca.gov)
FY 20-21 – enacted Budget as of 6.26.2020 Department Report (ca.gov)

D. Local Assistance

LifeLine's Local Assistance expenditures, along with wireline program participation, had been steadily declining before the Commission made wireless service eligible for LifeLine in 2014. After adding wireless service in FY 2014-15, overall program participation and Local Assistance expenses increased significantly and have declined slightly beginning in 2016-2017 to present as shown in Figure 3. Historical Local Assistance.

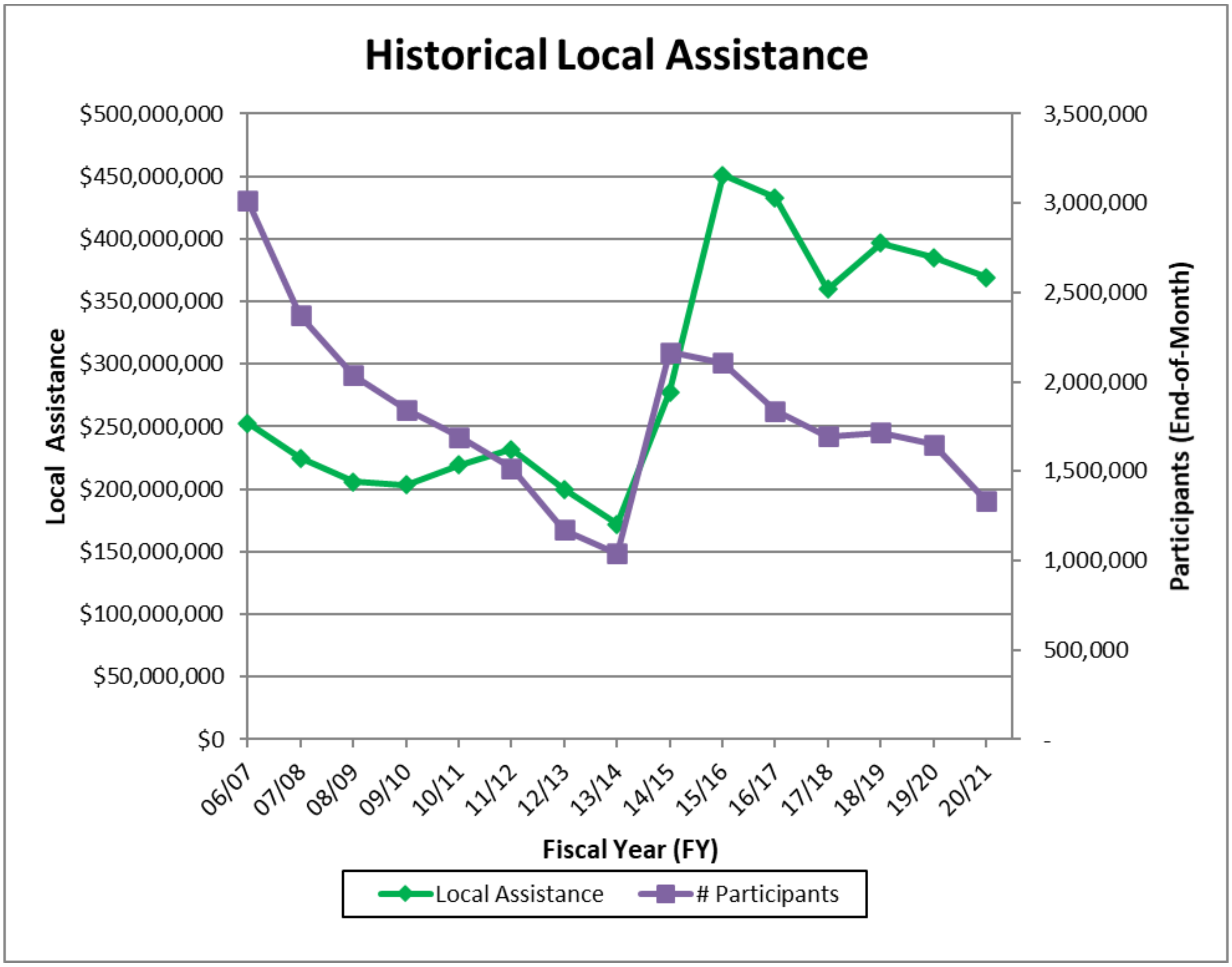


Figure 3. Historical Local Assistance

E. Historical Participation

At the end of FY 2019-20, approximately 1.7 million participants were enrolled in the California LifeLine program. Enrollment declined to 1.3 million during FY 2020-21, primarily due to the COVID-19 related customer protection actions taken by the Commission. Actions included a freeze on renewal certifications and a one-time de-enrollment of participants in the program for non-usage in May 2021. As of June 30, 2021, enrollment in the program was 1.3 million, as shown in Figure 4. Historical Participation.

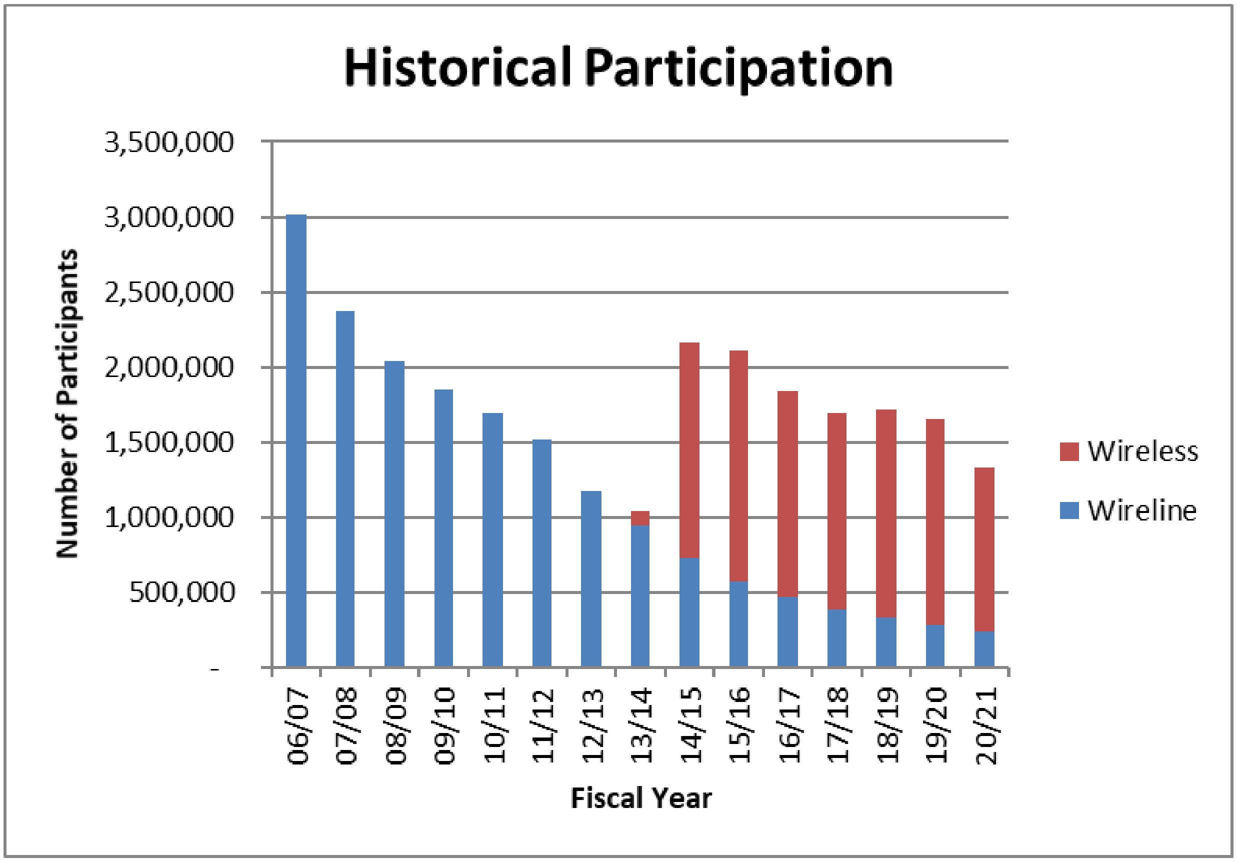


Figure 4. Historical Participation

F. Revenue and Surcharge Rates

Figure 5. Revenue and Surcharge Rates, shows ULTS fund annual revenue against the ULTS surcharge rates over the same years. The chart demonstrates that, while the surcharge rate remained constant at 1.15 percent from 2007 through 2015, revenues consistently decreased over the same period. This decrease in revenues is due to the declining intrastate revenues reported by telephone carriers.

In FY 2015-16, the Commission raised the surcharge twice to accommodate the increase in expenditures caused by the rapid increase in California LifeLine wireless participation. Historically, the surcharge remained at a consistent rate for over seven years; however, with the inclusion of California LifeLine wireless users in March 2014, revenues were insufficient to meet the increased expenses. From January to June 2015, the number of participants in the program doubled with almost 300,000 participants added in May and June 2015, as a result of including wireless services in California LifeLine. With the rapid increase in participation, service providers' claims increased from approximately $20 million per month to over $40 million per month.

As shown in Figure 5. Revenue and Surcharge Rates, the Commission has not changed the LifeLine surcharge rate since November 2016.

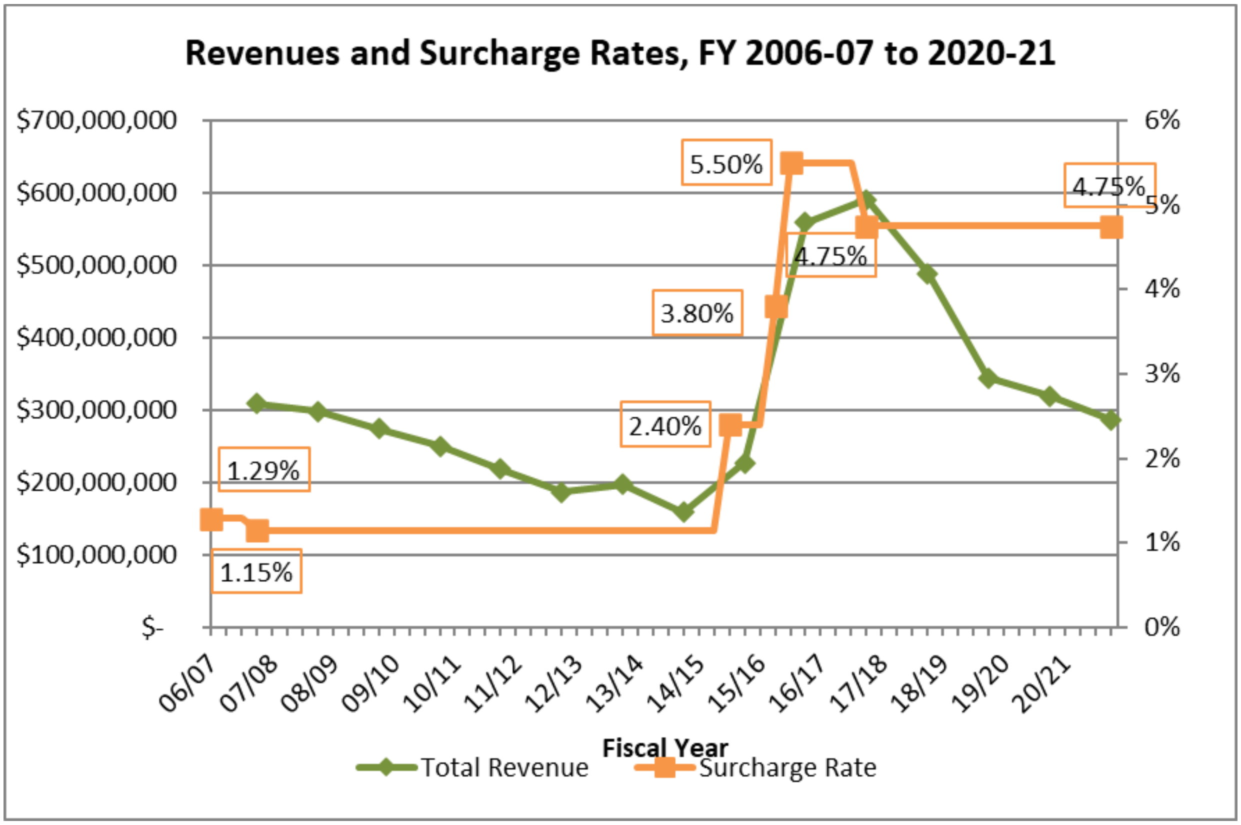


Figure 5. Revenue and Surcharge Rates

G. TPA Expenditures and Qualifications Processed

TPA expenditures are primarily driven by the number of qualifications processed. As shown below in Figure 6. TPA Expenditures and Qualifications Processed, TPA expenditures experienced a steady decline from FY 2008-09 through FY 2013-14 due to declining participation. This was followed by a sharp rise in consumer demand and participation starting in March 2014 to FY 2015-16 when the California LifeLine wireless service was introduced. This surge in demand increased program volume and costs proportionately.

Starting in March 2020, the program was managed to assist people during the COVID-19 pandemic by maintaining communication services. As a result, the Commission suspended both non-usage and renewal processes. Removals for non-usage remained suspended until May 2021 and removals for non-renewal were suspended until December 2021.

When the non-usage rules were restored in 2021, all subscribers who did not use their devices for over 30 days were notified that they had 15 days to use their devices to avoid being disconnected. This resulted in 679,050 subscribers being disconnected in the month of May.

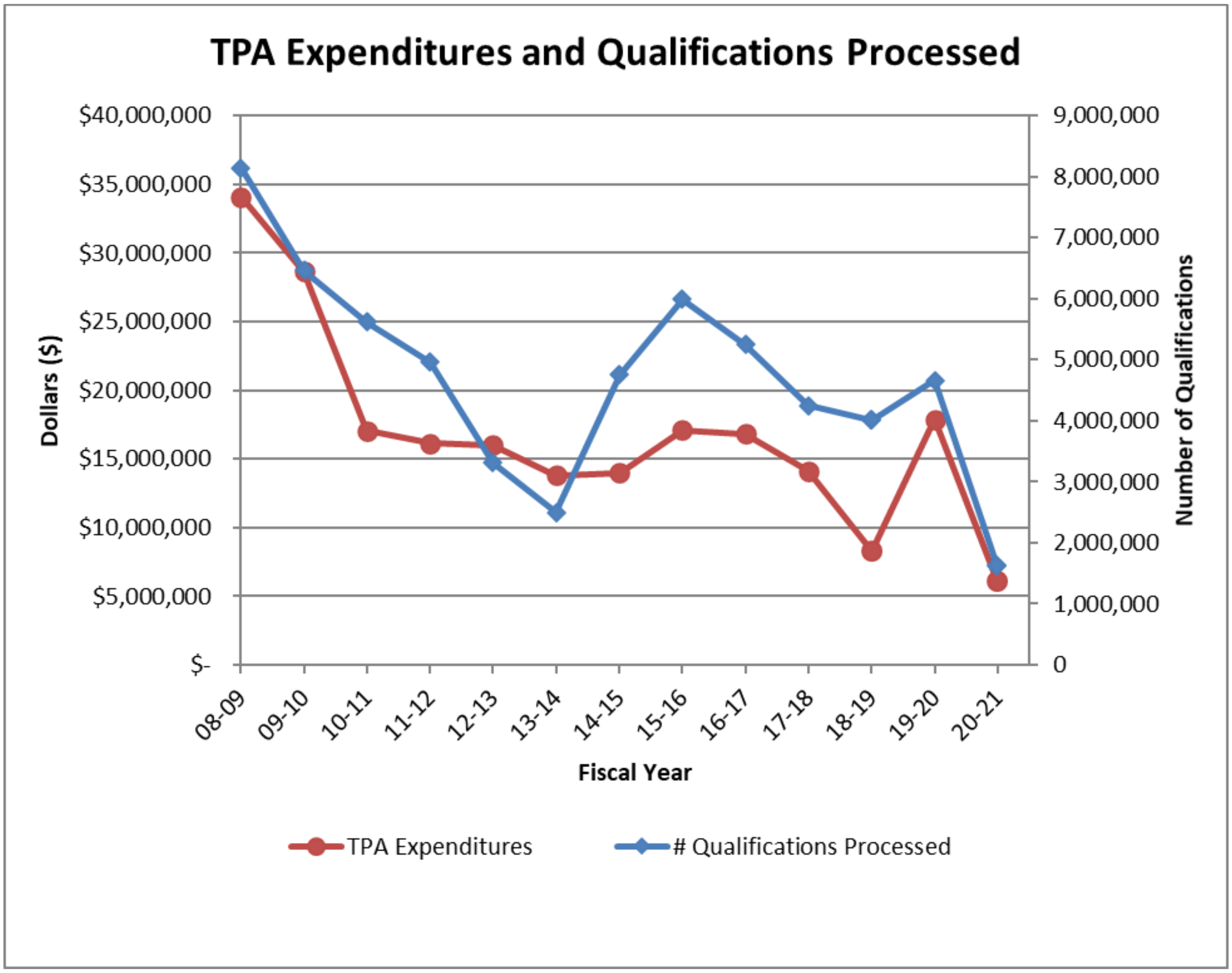


Figure 6. TPA Expenditures and Qualifications Processed

Plans for 2022

In 2022, the Commission is looking forward to addressing the challenges of the changing communication landscape introduced to the Program over the past two years. These include:

- Incorporating the findings and recommendations of the CSUS LifeLine Assessment Project
- Supporting rapidly changing communication technology and increased service provider competition
- Continuing to address the changing needs of consumers, including the most vulnerable, particularly the need for uninterrupted connectivity to essential services, family and friends, healthcare, and education
- Pursing the necessity of equitable Broadband access for all consumers
- Resuming the LifeLine program renewal process with an eye toward streamlined and consistent service

Appendix A

California LifeLine Participant Statistics by County

County	Total Households	Total Participants	% of Households	Rural Area	Veterans	Age ≥ 65
California	**13,085,036**	**1,398,040**	**10.7%**	**44,650**	**1,512**	**394,786**
Los Angeles	3,350,389	435,935	13.0%	1,391	315	138,302
San Diego	1,134,032	96,352	8.5%	1,474	227	28,216
Orange	1,046,676	80,335	7.7%	145	65	27,278
Riverside	725,160	85,736	11.8%	3,443	111	18,760
Santa Clara	641,019	36,515	5.7%	200	16	16,559
San Bernardino	637,569	101,501	15.9%	4,296	127	19,609
Alameda	572,918	41,804	7.3%	74	39	15,687
Sacramento	526,804	69,302	13.2%	713	97	15,299
Contra Costa	389,644	19,903	5.1%	92	60	5,873
San Francisco	365,197	38,322	10.5%	0	27	20,728
Fresno	304,353	64,592	21.2%	3,920	50	12,619
Ventura	275,217	20,563	7.5%	511	35	5,582
Kern	267,676	53,026	19.8%	2,734	47	8,919
San Mateo	266,217	7,357	2.8%	50	9	3,411
San Joaquin	225,087	37,244	16.5%	1,326	26	7,295
Sonoma	186,384	7,007	3.8%	539	9	2,555
Stanislaus	165,698	25,823	15.6%	1,072	22	5,310
Santa Barbara	149,506	10,595	7.1%	189	9	2,737
Solano	148,301	10,580	7.1%	193	24	2,436

Placer	145,911	4,425	3.0%	506	13	1,528
Tulare	138,940	22,908	16.5%	2,281	18	4,162
Monterey	127,872	13,616	10.6%	617	10	2,758
San Luis Obispo	107,642	3,504	3.3%	451	6	1,159
Marin	104,289	2,433	2.3%	87	3	946
Santa Cruz	95,943	5,705	5.9%	371	5	1,689
Merced	80,144	14,201	17.7%	1,336	6	2,651
Butte	79,452	8,988	11.3%	1,331	8	2,049
Yolo	73,648	5,550	7.5%	116	6	1,391
El Dorado	73,083	2,667	3.6%	892	6	870
Shasta	71,534	7,347	10.3%	1,716	16	1,962
Humboldt	57,757	4,309	7.5%	551	12	1,042
Imperial	51,252	13,945	27.2%	980	10	3,779
Napa	49,581	1,693	3.4%	96	8	609
Madera	44,210	7,888	17.8%	1,820	8	1,670
Kings	43,585	7,156	16.4%	570	8	1,230
Nevada	42,499	2,140	5.0%	736	9	774
Mendocino	35,361	2,220	6.3%	502	4	741
Sutter	32,154	4,515	14.0%	406	9	1,082
Lake	25,844	2,267	8.8%	552	3	628
Yuba	25,723	4,493	17.5%	526	1	738
Tehama	24,366	3,044	12.5%	1,226	2	782
Tuolumne	22,435	1,385	6.2%	554	5	483
Siskiyou	19,932	1,431	7.2%	804	5	536
Calaveras	19,102	783	4.1%	634	2	260
San Benito	18,156	1,272	7.0%	199	0	293
Amador	14781	728	4.9%	497	4	294

Lassen	10,455	511	4.9%	152	0	163
Glenn	10,222	1,092	10.7%	261	2	299
Del Norte	10,138	1,134	11.2%	213	2	279
Plumas	9,406	379	4.0%	195	1	151
Inyo	8,080	221	2.7%	55	0	80
Mariposa	7,913	755	9.5%	755	3	277
Colusa	7,367	446	6.1%	83	0	109
Trinity	6,228	58	0.9%	58	0	29
Mono	5,787	38	0.7%	38	1	17
Modoc	4,312	276	6.4%	96	1	88
Sierra	1,561	11	0.7%	11	0	8
Alpine	524	14	2.7%	14	0	5