

Memorandum



Date: February 14, 2014

To: Service List for Rulemaking 11-03-013, California LifeLine Program (California LifeLine) Administrative Committee Members, and California LifeLine Working Group Members

From: Public Utilities Commission—San Francisco – Communications Division

Subject: Guidance for Service Providers Interested in Offering California LifeLine Wireless Services Consistent with Decision 14-01-036

Advice Letter Filing Summary Sheet

1. Identify CPUC-designated utility number.
2. Prior to filing an advice letter a service provider must have a CPCN or a WIR.
3. Indicate Tier 2 or Tier 3.

	Tier 2	Tier 3
WIR Holder seeking ETC designation		
WIR Holder concurrently seeking ETC designation and authority to offer California LifeLine wireless services		
WIR Holder without ETC designation seeking authority to offer California LifeLine wireless services		
WIR Holder with ETC designation seeking authority to add, revise, or remove California LifeLine wireless services		

4. If exclusively adding, revising, or removing California LifeLine wireless services, explicitly refer to California LifeLine wireless services (not applicable for advice letters seeking ETC designation) by entering “California LifeLine wireless” as a part of the filing subject if interested in offering California LifeLine services.

5. If seeking both ETC designation and adding, revising, or removing California LifeLine wireless services, explicitly refer to ETC designation and California LifeLine wireless services by entering "ETC and California LifeLine wireless" as a part of the filing subject.
6. File California LifeLine wireline and California LifeLine wireless services in different advice letters.
7. Consult the CPUC's ETC team (Charles Christiansen and Angel Ahsam) for guidance regarding advice letters seeking ETC designation and/or ability to offer enhanced Lifeline services. Contact information for the ETC team is as follows:

Charles Christiansen (Supervisor)	415-703-1901	chc@cpuc.ca.gov
Angel Ahsam (Analyst)	415-703-5482	aba@cpuc.ca.gov

8. If exclusively adding California LifeLine wireless services, then serve the advice letter to the California LifeLine proceeding's (R. 11-03-013) service list and to the appropriate advice letter service lists found at <https://ia.cpuc.ca.gov/alsl/getlist.aspx> (most likely, "Changes in rates, terms and conditions of service, or initiation of new service").
9. If seeking both ETC designation and adding California LifeLine wireless services, then serve the advice letter to the California LifeLine proceeding's (R. 11-03-013) service list and to "Advice Letters for Eligible Telecommunications Carrier designation requests".

Cover Sheet

1. Explicitly refer to California LifeLine wireless services.
2. Identify the licensee or entity authorized by the CPUC as the telephone service provider that will offer the proposed California LifeLine wireless service(s) as may

be described in more particularity or limited by a provider to a subsidiary or brand of the WIR holder.

Affirmative Statements

1. Include the following statements and affirmatively agree to them in writing.
 - a) Comply with the CPUC's rules, orders, and decisions, including General Order 153 and Decision 14-01-036, and the California Public Utilities Code.
 - b) All plans, including bundled service, promotional service, and family plans, that meet or exceed the minimum service elements and are consistent with California LifeLine rules will be eligible for the California LifeLine discounts. *(If seeking an exemption from this requirement, respond to the part called "Request for Allowable Exemptions" below and exclude this statement.)*
 - c) Make available to California LifeLine participants all handsets on the same basis as to retail customers. *(If seeking an exemption from this requirement, respond to the part called "Request for Allowable Exemptions" below and exclude this statement.)*
 - d) Provide free, unlimited access to customer service representatives fluent in the same language (English and non-English) in which California LifeLine service was originally sold or marketed. Calls to the provider's customer service shall not count against the participant's allotted voice minutes or number of calls.
 - e) Provide free, unlimited access to 611 for service provider billing and repair services without counting these calls to 611 against the participant's allotted voice minutes or number of calls.

CPUC-Designated Authority to Offer Telecommunications Services in California

1. Is the CPUC-designated WIR holder also an ETC? Yes or No.

2. If the WIR holder is a federal Lifeline wireless ETC, will the currently approved federal Lifeline wireless plans still be offered in conjunction with the California LifeLine wireless plans identified below? Yes or No.
3. Indicate the date the CPUC granted the WIR. (*SKIP if have ETC status*)
4. Does the WIR holder have any lapses in collecting and remitting any public purpose program surcharges and CPUC user fees? Yes or No. If yes, have they since been collected and remitted? Yes or No. (*SKIP if have ETC*)
5. Identify whether the California LifeLine wireless services of which are subject of the advice letter will be provided as part of the service provider's COLR obligations.

California LifeLine Plans Comparison Chart

1. Complete the Comparison Chart for all proposed California LifeLine plans.
2. Are there retail plans that meet or exceed the California LifeLine service elements of which the submitted Comparison Chart does not include? If yes, also respond to the part called "Request for Allowable Exemptions" below.
3. Indicate whether the proposed California LifeLine wireless service plans will be offered on a pre-paid or post-paid basis.
4. Additional columns for proposed plans may be added.
5. Additional rows for services and/or features may be added.
6. For services and features whereby the California LifeLine provider does not intend to charge a rate, fee, or price, indicate "\$0", "No charge", "Included", and/or "Free" for each applicable service and feature.
7. For services and features whereby the California LifeLine provider does not intend to offer the listed service, feature, and/or plan, indicate "N/A" for each applicable service, feature and/or plan.
8. Here is a template for the comparison chart:

	CALIFORNIA LIFELINE UNBUNDLED PLAN	CALIFORNIA LIFELINE BUNDLED PLAN
Regular Rate		
Federal Lifeline Discount		
California LifeLine Discount		
Monthly Discounted Rate		
Number of Minutes		
Domestic Messages		
Data		
Applicable Taxes, Fees, and Surcharges		
California LifeLine Taxes, Fees, and Surcharges Exemption		
Per Minute/Message Fee for Additional Minutes/Messages		
Fee for Additional Data		
Fee for Calling N11 Special Service Numbers		
Fee for Calling 411		
Fee for Calling Directory Assistance		
Fee for Calling Operator Services		
Regular Activation Fee		
Discounted Activation Fee		
Cell Phone Fee		
Restocking Fee		
Deposit		
Early Termination Fee		
Nationwide Domestic Long Distance		
Caller ID		
Call Waiting		
Call Forwarding		
Voicemail		
3-way Calling		
Rollover Unused Minutes/Text Option		
Contract Needed		
Credit Check Needed		

In-Language Customer Service Support for California LifeLine Services

1. Identify the basis upon which the in-language customer service support will be provided to California LifeLine participants.
 - a) Will the service provider be using the language in which the service provider sold the California LifeLine services as the basis? Yes or No.
 - b) Will the service provider be using the language in which the service provider marketed the California LifeLine services as the basis? Yes or No.
2. Identify the non-English languages in which customer service support will be provided for California LifeLine services.
3. Identify the methods by which California LifeLine services will be marketed.

General Instructions for the Schedule of Rates and Charges, Terms and Conditions, and Disclosures.

1. Specifically denote where and indicate how in the included schedule of rates and charges, terms and conditions, and/or disclosures each proposed California LifeLine wireless service plan complies with each California LifeLine wireless service element in Appendix A-2 of General Order 153.
2. Make a showing in the schedule of rates and charges, terms and conditions, and/or disclosures for these required items:
 - a) California LifeLine participants' exemption from taxes and surcharges, CPUC user fee, federal excise tax, local franchise taxes, and State 911 tax associated with telephone service;
 - b) 30-day notice to California LifeLine participant before the service provider withdraws from offering the services;

- c) California LifeLine unbundled obligation i.e., participants are not required to purchase bundled plans with video, data, and/or other services to receive California LifeLine discount;
- d) If the California LifeLine participant fails to receive a voice-grade connection and notifies the service provider, the service provider will (1) promptly restore the voice-grade connection, or if not possible (2) provide telephone service to that participant using a different technology if offered by the provider and if the participant agrees;
- e) Conditions under which California LifeLine participants may terminate service if a voice-grade connection cannot be provided to them;
- f) Ability of California LifeLine participants to terminate service within 14 days of service activation without incurring early termination fees, if applicable;
- g) Ability of California LifeLine participants to terminate service within three days of service activation, excluding national holidays, and to receive a refund of any applicable service connection charges and deposits;
- h) Provision of free, unlimited access to 911 emergency services is provided in compliance with current state and federal laws and regulations, as well as information regarding 911 emergency services;
- i) Offering of California LifeLine plan(s) with at least 501 voice minutes that may include domestic messaging;
- j) Offering of at least one California LifeLine plan that meets or exceeds the California LifeLine service elements and is not bundled with any video or data services. Additional features and/or enhanced service elements may be added without additional charge(s);
- k) Pricing structure of how California LifeLine participants may purchase additional voice minutes at the lowest rate that is offered to retail customers for comparable plans with similar services and/or features;

- l) Ability of California LifeLine participants to pay their phone bills in person without being assessed a fee if the service provider offers this payment method;
- m) Ability of California LifeLine participants to return their device(s) within three days of service activation without being assessed a restocking fee for the returned device(s);
- n) Provision of free, unlimited access to customer service for information about California LifeLine, service activation, service termination, service repair, and bill inquiries. Calls to the provider's customer service shall not count against the participant's allotted voice minutes or number of calls.
- o) Provision of free access to toll-blocking service.
- p) Provision of free access to toll-control service if the service provider is capable of offering toll-control service and the California LifeLine participant has no unpaid bill for toll service;
- q) Provision of access to two California LifeLine discounted telephone lines to Deaf and Disabled Telecommunications Program participants.
- r) Provision of free access to the California Relay Service via 711. Associated calls made using the 711 relay service may count against minutes.
- s) Provision of free, unlimited access to 211, 311, 511, 711, and 811 calls for eligible plans with 1,000 or more voice minutes without counting against allotted voice minutes or number of calls. Wireless service providers may meet this obligation by offering these features on plans with 1,000 or more minutes or by offering at least one plan with unlimited voice minutes and which may include text, but not video or data.

Schedule of Rates and Charges

1. For each California LifeLine wireless service plan, include all the rates and charges to which a California LifeLine participant may be subject.
2. For services and features whereby the California LifeLine provider does not intend to charge a rate, fee, or price, indicate “No charge”, “Included”, and/or “Free” for each applicable service and feature.
3. Identify the plans that are promotional and of a limited period. Identify the length of the promotional period.

Terms and Conditions

1. For each California LifeLine wireless service plan, include all the terms and conditions to which a California LifeLine participant may be subject.
2. Provide a copy of the terms and conditions of which the California LifeLine participant may receive.

Disclosures

1. Provide a copy of the disclosures of which the California LifeLine participant may receive.
2. If the disclosures are a part of the terms and conditions, then indicate where in the terms and conditions each required disclosed item is located.
3. Include these required disclosures from Decision 14-01-036 of which requires the service provider to prominently disclose and disseminate all terms and conditions, comprising of the following:
 - a) Before activating service, disclose and disseminate California LifeLine participant's entitlement to a voice-grade connection and the conditions under which the participant may terminate service without penalty if a voice-grade connection cannot be provided;

- b) Any applicable service connection charges and deposits will be refunded if the California LifeLine participant terminates service within three days of service activation, excluding national holidays;
- c) Early termination fees will not apply if the California LifeLine participant terminates service within fourteen days of service activation;
- d) All approved California LifeLine plans;
- e) All rates and fees;
- f) Charges, terms, and conditions associated with purchasing additional minutes;
- g) 911 emergency services location accuracy and reliability standards as required in basic service element number I.2.(d) in Appendix A of Decision 12-12-038;
- h) Potential service coverage and service quality issues;
- i) Safety related considerations when handsets are removed from the home and when there is poor mobile reception;
- j) Charges for 800 or 800-like toll-free services if the participant does not subscribe to unlimited voice service;
- k) Condition of device for California LifeLine wireless service if refurbished;
- l) Device's applicability on other providers' wireless networks if the participant were to switch providers;
- m) Power back-up requirements for a system that supports California LifeLine wireless service, including limitations due to power for equipment on towers or other facilities;
- n) Charges or fees associated with using operator services;
- o) Impact(s) of terminating wireless service for contracts lasting more than one year; and
- p) Charges and conditions associated with 411 access and information.

Exercising the Waiver of Pre-qualification Requirement for Pre-Paid California LifeLine Wireless Services

Indicate whether the California LifeLine wireless provider chooses to exercise the waiver of the pre-qualification requirement for California LifeLine wireless services offered on a pre-paid basis.

Request for Allowable Exemptions

1. Identify the exemptions sought for the all plans and all handsets requirements.
2. Justify the exemptions sought.