

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 25, 2024

To: California LifeLine Service Providers

**Re: GUIDANCE REGARDING THE LIFELINE USAGE REQUIREMENT
RELEASED BY THE FCC ON MAY 23, 2024 (ADMINISTRATIVE LETTER 6)**

On May 23, 2024, the Federal Communication Commission's Wireline Competition Bureau issued a Public Notice¹ reiterating the importance of Lifeline usage requirements for Eligible Telecommunications Carriers (ETCs). This letter is to inform California LifeLine service providers that compliance with these requirements is mandatory for California LifeLine services.²

Specifically, California LifeLine service providers must track the usage of subscribers who are not paying a monthly fee. A one-time fee or a fee collected from the subscriber annually decremented on a monthly basis does not satisfy the rule's requirement to "assess and collect a monthly fee."³ If a subscriber is not paying a monthly fee, the subscriber must use the service at least once every 30 days to remain eligible for California LifeLine service.

Subscriber's Usage Includes:⁴

- Completing an outbound call or data usage;
- Buying minutes or data to add to their plan;
- Answering an incoming call, excluding calls from their provider or a provider's representative;
- Responding to communication from their provider and confirming their intent to continue receiving LifeLine service; or
- Sending an outbound text message.

Subscriber Service Termination:⁵

- California LifeLine service providers must provide a 15-day notice to subscribers who do not use the service for 30 consecutive days, informing them that failure to use the service will result in the termination after 15 days.
- California LifeLine service providers are required to de-enroll subscribers if they fail to use the service during the 15-day cure period.

¹ See Wireline Competition Reminds Eligible Telecommunications Carriers of Lifeline Requirements, Public Notice, DA 24-489 (rel. May 23, 2024), available here: <https://docs.fcc.gov/public/attachments/DA-24-489A1.pdf>.

² California LifeLine program's non-usage rules mirror the federal Lifeline non-usage rules.

³ *Id.*

⁴ See 47 C.F.R. § 54.407(c); see also General Order 153, Section 5.7.1.

⁵ See 47 C.F.R. § 54.405(e)(3); see also General Order 153, Section 5.7.2.

- California LifeLine service providers will not receive reimbursement for subscribers who fail to use the service during the 30 consecutive days and do not cure their non-usage within the 15-day cure period.

If you have any questions regarding this notice, please contact Tina Lee at 415-703-2285 or U17@cpuc.ca.gov.

Sincerely,



Gelareh Safavi
Communications Division Program Manager
California Public Utilities Commission