

2021 -2022

# ULTS-AC Annual Report

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## **UNIVERSAL LIFELINE TELEPHONE SERVICE TRUST – ADMINISTRATIVE COMMITTEE**

Pursuant to Public Utilities (P.U.) Code Section 277(a) the Universal LifeLine Telephone Service Trust Administrative Committee (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 1.25 million subscribers as of September 30, 2022, 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, 2021, and October 1, 2022, the ULTS-AC met four 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
- Provided updates regarding developments in the FCC’s Lifeline and Affordable Connectivity Program, and its predecessor, the Emergency Broadband Benefit 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 2021/2022**

### October 2021- September 2022

- September 23, 2021, ALJ Ruling extends the suspension of the renewal process and three-month income documentation rule.
  - Ruling extends the suspension of the renewal processes and rule requiring income eligibility documentation to cover three months, where the suspension was initiated on March 19, 2020, due to the coronavirus pandemic.
  - The suspension continued for as long as the renewal process of other state public assistance programs remain suspended, or for as long as the federal Lifeline program's renewal process is suspended.
- December 15, 2021, ALJ Ruling requests comments on Staff Recommendations for Renewal Improvements
  - Staff recommends improvements to the process of renewing existing LifeLine subscribers’ proof of eligibility and to implement AB 74.
  - Recommended improvements include: (1) connecting the TPA and Cal-Fresh enrollment databases to facilitate automatic eligibility confirmation; (2) modernizing the web-based renewal portal; (3) increasing SMS-text message

communication by TPA to subscribers; and (4) modifying the TPA’s “Correctable Denial Process.”

- FCC Emergency Broadband Benefit (EBB) Program
  - Pursuant to the Administrative Letter dated June 22, 2021, the Communications Division directed providers to file Tier 1 and Tier 2 advice letters, as applicable, for approval of EBB Plans that were also supported by the California LifeLine Specific Support Amount (SSA) and the FCC Lifeline subsidy. The Administrative Letter further clarified that the federal EBB and Lifeline subsidies would be deducted prior to the California SSA
  - During the transition from EBB to its successor, the Affordable Connectivity Program (ACP), the FCC provided for a 60-day transition period for providers to inquire whether existing EBB subscribers want to “Opt-in” to receive ACP service.
  - During the 60-day transition period from 12/31/2021 – 3/31/2022, subscribers continued to receive their EBB service; and the \$50 benefit and if eligible both the CA SSA and the federal Lifeline subsidy until March 31, 2022.
  - December 31, 2021, FCC Emergency Broadband Benefit (EBB) Program Ends
  
- FCC Affordable Connectivity Program (ACP).
  - As part of the Infrastructure and Investment Jobs Act signed into law by President Biden on November 15, 2021, Congress tasked the FCC with implementing the Affordable Connectivity Program (ACP) by 12/31/21 to address the digital divide and broadband affordability.
  - January 1, 2022, the FCC Affordable Connectivity Program (ACP) begins.
  - ACP extended many aspects of its predecessor FCC program, the Emergency Broadband Benefit,
  - ACP has a \$14.2B budget and is expected to continue implementation until funds are exhausted in 2-3 years, depending on the level of participation.
  - ACP offers the following discounts to eligible households
    - \$30/month per non-tribal household;
    - \$75/month per tribal household, and
    - A connected device discount of \$100, if customer provides a co-payment of \$10-\$50.
  - Pursuant to the Administrative Letter dated April 21, 2022, the Communications Division directed EBB providers to submit Tier 1 and Tier

2 advice letters, as applicable, to document the end of the EBB program and provided guidance for transition of customers from EBB to ACP.

- January 3, 2021, ALJ Ruling extends the suspension of the renewal process and three-month income documentation rule through March 31, 2022.
  - On December 30, 2021, the FCC extended the waiver of the federal Lifeline program's renewal process and three-month income documentation rule until March 31, 2022.
  - The ALJ ruling aligns the federal Lifeline waiver with the suspension of the California LifeLine renewal process and three-month income documentation rule.
- January 24, 2022, ALJ Ruling requests comments on extending the iFoster pilot program.
  - On July 19, 2021, Decision 21-07-008 ended the Boost Mobile pilot program and extended the iFoster pilot to January 31, 2022.
  - D. 21-07-008 directed CD to develop a plan enabling foster youth to participate in LifeLine no later than February 1, 2023.
  - The ruling requested comments on the following areas: creating a pilot that addressed the unique needs of foster youth; leveraging state and federal programs like Lifeline and ACP; determining support amount and costs of the pilot; and eliminating enrollment barriers facing foster youth.
- March 21, 2022, ALJ Ruling requests comments on ACP Staff Proposal.
  - The ACP Staff Proposal recommended ways to leverage the ACP to support LifeLine subscribers in meeting their broadband needs.
  - Under the Staff Proposal, the lack of affordable wireline broadband plans led to a recommendation to combine California LifeLine and ACP support for providers of wireline broadband to eligible households.
  - Moreover, the Staff Proposal recommended that it was not necessary to provide CA LifeLine SSA to ACP and federal Lifeline wireless offers because those plans provided adequate broadband service.
- March 28, 2022, ALJ Ruling extends the suspension of renewal process and three-month income documentation rule through June 30, 2022.
  - On March 25, 2022, the FCC extended its similar waiver through June 30, 2022.



- May 19, 2022, Decision 22-05-014 authorizes renewal process improvements.
  - In compliance with AB 74, the Commission authorized the following improvements to the annual process of renewing eligibility determinations for existing LifeLine subscribers:
    - Connecting the TPA and Cal-Fresh enrollment databases to facilitate automatic confirmation of eligibility and the elimination of certain PIN-based renewal requirements.
    - Modernization of the web-based renewal portal.
    - Increasing use of SMS-text message communication by TPA to subscribers.
    - Modifications to the TPA’s “Correctable Denial Process.”
  
- On May 20, 2022, CD published the California Program Evaluation & Assessment prepared by Sacramento State University (Program Assessment) and an ALJ Ruling requested comments on the following recommendations in the Program Assessment:
  - Incentivizing LifeLine offers providing home broadband and voice services;
  - Reimbursement for quality devices and quality standards for devices;
  - Metrics to measure the success of the Program;
  - Collaboration between the Commission and a community-based organization to develop marketing, education, and outreach plans;
  - Developing strategies to reach hard-to-reach populations;
  - Creating standards for providers’ in-person enrollment agents (“street teams”) and strategies to increase transparency and competition; and
  - Encouraging more providers to offer service in tribal lands.

## **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 completed its evaluation of the LifeLine program in May 2022 and made several recommendations for strategic planning, website modernization, promoting home broadband solutions, increasing competition, and targeting outreach to communities that have not previously participated in the Program. The Commission presented and requested comments on the Program Assessment from parties in the LifeLine rulemaking. Comments from parties, coupled with the CD's planning to implement the recommendations in the Report, will help the Commission prioritize the issues that will 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. In D. 22-05-014, the Commission authorized implementation of four recommendations from the Renewals Working Group and Staff Proposal for improving the renewals and recertification process for LifeLine participants.<sup>1</sup> Additionally, the launch of the Service Provider Intake Application (SPIA) has greatly improved the efficiency of automatic processing of renewal applications by the TPA. The ULTS-AC applauds the Commission for authorizing the Renewal Working Group's

<sup>1</sup> D. 22-05-014 Conclusions of Law 1, page 13.

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 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 Order<sup>2</sup> outlined a multi-year phase out of voice-only Lifeline service culminating in federal-voice only Lifeline subsidies. According to the 2016 Order, the FCC initially planned to phase-out (reduce to \$0 per month) the subsidy to voice-only Lifeline service effective December 1, 2021. In November 2021, the FCC waived for one year the scheduled phase-out of support for voice-only service.<sup>3</sup> In the July 2022, the FCC further extended for one year the phase-out of support for voice-only service through November 31, 2023.<sup>4</sup>

<sup>2</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3989-97, paras. 73-98 (2016).

<sup>3</sup> See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42, Order, DA 21-1389, paras. 13-18 (WCB Nov. 5, 2021).

<sup>4</sup> See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42, Order, DA 22-706, paras. 12-17 (WCB July 1, 2022).

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 and Integration of Affordable Connectivity 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 led 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 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.

Since the FCC has introduced the EBB program and ACP, which offer additional federal support for qualifying broadband plans, the Commission should continue to assess the relationship between California LifeLine and the federal programs supporting affordable broadband.

## 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.<sup>5</sup> 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”<sup>6</sup> and in D.21-07-008<sup>7</sup> as it considers a potential extension of the iFoster Pilot.

Additionally, the ULTS-AC commends the Commission on D. 22-05-014 which authorizes the LifeLine Third Party Administrator to complete the process of renewing participants’ Program eligibility based on a review of databases of participants of qualifying state or federal programs.<sup>8</sup> More than 96% of recently enrolled LifeLine participants used a “programmatically” eligibility pathway to qualify for LifeLine, the vast majority of which use participation in either CalFresh or Medi-Cal.<sup>9</sup> The established connection with the CalFresh database has greatly streamlined the eligibility determinations required for the renewal/recertification process for a large share of 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

<sup>5</sup> 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.

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

<sup>7</sup> *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.

<sup>8</sup> D. 22-05-014, Conclusions of Law 1, page 13.

<sup>9</sup> D. 22-05-014, page 7; *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.

programs and partnerships within the LifeLine program in D.18-12-019.<sup>10</sup> However, given the apparent shortcomings of the recent Boost/CARE pilot and the challenges in maintaining participation in the iFoster 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.

## **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 19, 2022, the most recent ULTS-AC Meeting, the ULTS-AC has 3 primary position vacancies and 8 alternate position vacancies. Filling 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 providers have

been audited for compliance with LifeLine rules and regulations.<sup>10</sup> 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.

<sup>10</sup> See, for example, the Independent Accountant’s Report of Telescape Communications, Inc. DBA TruConnect – California LifeLine Program, which was completed by the California State Controller’s Office on December 16, 2019.

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