

**BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA**

Application of Pacific Bell Telephone
Company D/B/A AT&T California (U1001C)
to Relinquish its Eligible
Telecommunications Carrier Designation

Application 23-03-002
(Filed March 3, 2023)

**RESPONSE OF THE UTILITY REFORM NETWORK AND CENTER FOR
ACCESSIBLE TECHNOLOGY TO THE SUMMARY OF PARTY POSITIONS**

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Pursuant to the Administrative Law Judge Thomas J. Glegola's email ruling, issued on January 19, 2024, The Utility Reform Network (TURN) and Center for Accessible Technology (CforAT) respectfully submit the attached revised summary of party positions. The attached revision modifies TURN and CforAT's summary of their positions to address minor, non-substantive modifications. No modifications were made to AT&T's summary of its position in the *Summary of Party Positions for Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) and Intervenors* filed on January 16, 2024.

Respectfully submitted,

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AT&T California's ETC Application Summary

AT&T California has filed an application with the Commission to surrender its Eligible Telecommunications Carrier ("ETC") designation. As an ETC, AT&T California receives federal support to offer Lifeline voice service. The federal government plans to end support for Lifeline plans without broadband, and AT&T California does not offer Lifeline plans with broadband. Thus, AT&T California will no longer need its ETC designation.

Federal law allows AT&T California to surrender its ETC designation for each area served by another ETC and directs the California Public Utilities Commission to require the remaining ETC(s) to serve AT&T California's Lifeline customers. AT&T California's application has identified other ETCs available throughout AT&T California's service area. That means AT&T California's Lifeline customers will continue to have options for low-cost Lifeline service. These alternatives include service from wireless carriers like Assurance, Boomerang, and TracFone and from cable companies like Cox and Time Warner.

There is a clear legal test under federal law for this process. Many other companies have used the same legal test to relinquish their ETC status in California. AT&T California has shown that it meets the test under federal law, which means the California Public Utilities Commission must grant approval.

Permitting AT&T California to give up its ETC designation will not harm consumers. AT&T California's Lifeline subscribers have been sharply decreasing for many years. Customers now overwhelmingly choose Lifeline service from mobile wireless companies instead of Lifeline through traditional landline phone service from AT&T California. AT&T California's remaining federal Lifeline customers will be able to choose federal Lifeline service from the other ETCs serving AT&T California's service area. If customers prefer to remain with AT&T California, they will be able to continue receiving state LifeLine service (which does not depend on ETC status) from AT&T, without the federal benefit. AT&T California will continue to offer basic telephone service in all of its service area unless and until it separately obtains all necessary permission to stop, so no customer will lose service if the Commission approves AT&T California's application.

CONSUMERS OPPOSE AT&T'S ATTEMPTS TO STOP SERVING LOW-INCOME HOUSEHOLDS

WHAT IS HAPPENING?

- Currently, AT&T must provide service to every reasonable request for service in its statewide service territory. AT&T must also offer federal and California LifeLine throughout its service territory to make services more affordable for low-income households.
- AT&T filed two applications at the CPUC asking to be relieved of these service requirements.

WHAT IS AT&T ATTEMPTING TO DO TO YOUR PHONE SERVICE?

Federal Lifeline is a low-income program that helps eligible households pay for home or cell phone service. Currently, AT&T offers federal Lifeline service throughout its entire California service territory. AT&T wants to stop offering federal Lifeline service. If AT&T wins in this proceeding, *low-income households may expect a 200% increase, or more*, in their monthly phone bill.

WHY DO CONSUMERS OPPOSE AT&T'S EFFORTS?

- For some Californians, landline services are the only safe, affordable, and reliable phone service. In certain areas, AT&T is the only available landline service provider.
- Landlines can be more reliable than cell phones for emergencies and disasters, especially during a power outage.
- Many AT&T customers on Lifeline services do not have another landline option.

IF THE CPUC AGREES WITH AT&T, WHAT WILL HAPPEN TO YOUR SERVICE?

- AT&T would no longer offer low-cost service.
- AT&T will be able to decide whether it wants you to have telephone service.
- AT&T has stated that it intends to shut down its landline telephone network. Additionally, AT&T could terminate your service, even if you are not a LifeLine customer.

See if your community will be affected:

- A list of affected cities is available here:
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M521/K479/521479757.PDF>
- A list of affected Tribal areas is available here:
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M522/K825/522825071.PDF>

WHAT CAN YOU DO ABOUT IT?

- Speak up at a Public Participation Hearing. Share with CPUC leadership how AT&T's plans will affect you.
- Learn about and get involved in consumer advocates' efforts to oppose AT&T:
<https://www.turn.org/colr>