BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	
Section 63.71 Applications of AT&T Services, Inc., on behalf of its affiliate; Pacific Bell Telephone Company d/b/a AT&T California	WC Docket No. 26-120; Comp. Pol. File No. 2137
Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, To Discontinue the Provision of Service	WC Docket No. 26-121; Comp. Pol. File No. 2138

COMMENTS OF THE PEOPLE OF THE STATE OF CALIFORNIA AND THE CALIFORNIA PUBLIC UTILITIES COMMISSION

CHRISTINE J. HAMMOND
JONATHAN C. KOLTZ

505 Van Ness Avenue
San Francisco, CA 94012
Telephone: (415) 703-2760
Email: jonathan.koltz@cpuc.ca.gov

Attorneys for the People of the State of California and the California Public Utilities Commission

June 15, 2026

On May 20, 2026, AT&T filed two applications seeking to discontinue residential and business POTS service in wire centers throughout California.[1] On May 29, 2026, the Wireline Competition Bureau set the comment deadline at June 15, 2026. The People of the State of California and the California Public Utilities Commission ("CPUC" or "California") now file these comments. Because AT&T has failed to demonstrate that granting its applications would not adversely affect the public convenience and necessity, the Commission must reject them as a matter of law.[2] At a minimum, we respectfully submit that the Bureau should remove these applications from streamlined processing,[3] and that the Commission should require AT&T to address the deficiencies we identify below.

In its applications, and in other petitions it filed contemporaneously, AT&T asserts that California seeks to prohibit or hinder wireline carriers from discontinuing copper

[1] *Section 63.71 Application of AT&T Servs., Inc.*, WC Dkt. 26-120 (filed May 20, 2026) ("AT&T Business POTS Discontinuance Application"); *Section 63.71 Application of AT&T Servs., Inc.*, WC Dkt. 26-121 (filed May 20, 2026) ("*AT&T Residential POTS Discontinuance Application*").

[2] 47 U.S.C. § 214(a).

[3] *See Reducing Barriers to Network Improvements and Serv. Changes*, Report and Order, FCC 26-19, WC Dkt. 25-209, para. 54 (Mar. 27, 2026) ("*Network Modernization Order*") ("Should the Bureau have any concerns about whether it is in the public interest to grant a particular request to discontinue service, it will remove the application from streamlined processing for further review, thus mitigating the risk that customers will be left without voice services in the wake of a discontinuance.").

facilities and investing in fiber.[4] Indeed, AT&T has been making this argument for years.[5] It is not and has never been true.

Of all states, California recognizes the importance of technological innovation, and California makes the practical application and commercialization of the best new technologies a reality. The point makes itself: we are the home of Silicon Valley, the RAND Corporation, the Lawrence National Laboratories, the Jet Propulsion Laboratory, and countless other world-class universities and research institutes. We are at the forefront of artificial intelligence, biotech and life sciences, rocketry, clean energy, autonomous vehicles, and the internet.

Thus, nearly twenty years ago, the CPUC *declined* to adopt rules proposed by the competitive carriers that would restrict ILECs from retiring copper loops in favor of fiber, implementing instead a streamlined process by which the ILEC had only to notify the CPUC and any interconnecting CLECs of a proposed network transition.[6] We found that overly prescriptive rules would "discourage and delay fiber systems from being built in California, contrary to clear state legislative direction to bring affordable and widespread

[4] *See*, *e.g. AT&T Residential POTS Discontinuance Application* at 5 ("California requires AT&T to continue offering POTS throughout its territory."); *Petition of AT&T for Preemption and Declaratory Ruling Regarding California's Carrier of Last Resort and Related Requirements*, WC Dkt. 26-125, at 3 (filed May 20, 2026) ("*AT&T Preemption Petition*") ("[I]n California, the aging, fragile, and expensive copper lines are still there, frozen in time by California regulations . . . ."

[5] *See*, *e.g.*, Comments of AT&T Servs., Inc., WC Docket No. 17-84, at 76 (filed June 15, 2017) (arguing that the Commission should preempt state Carrier of Last Resort rules because they hinder carriers' "ability to retire their legacy TDM services").

[6] *Decision Adopting Process Governing Retirement by Incumbent Local Exchange Carriers of Copper Loops and Related Facilities Used to Provide Telecommunications Services*, D.08-11-033 (Cal. P.U.C. Nov. 6, 2008), *available at* https://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/93730.PDF.

high quality communications services to all Californians"[7] and so "exempt[ed] ILECs from seeking [CPUC] approval . . . of the retirement of copper loops" as long as the ILEC "offer[ed] to its retail end-user customer the comparable service over fiber that the customer was previously receiving."[8] Now, as in 2008, California "has a strong interest in advancing policies that promote the widespread availability of broadband networks (including fiber deployment) to ensure global competitiveness and economic development in our State."[9]

Nor is it the case, as AT&T would have it, that California's Carrier of Last Resort rules cut against those policies. As we have stressed for years, the point of those rules is not to hold back time but to ensure that, in line with our nation's universal service goals,[10] "all residential telephone customers, no matter where they live in California, can expect a certain minimum level of service."[11] Thus, California's Carrier of Last Resort and related requirements "apply on a technology-neutral basis to all forms of communications technology that may be utilized . . . ."[12] And we recognized that this required regulatory flexibility:

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[7] *Id.* at 2.

[8] *Id.* at 13-14.

[9] *Id.* at 14.

[10] *See*, *e.g.*, *Rural Cellular Ass'n v. FCC*, 588 F.3d 1095, 1098 (D.C. Cir. 2009) (explaining that the universal availability of telecommunications service is "a fundamental goal of federal telecommunications regulation").

[11] *Decision Adopting Basic Telephone Service Revisions*, D.12-12-038, at 2 (Cal. P.U.C. Dec. 20, 2012), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M039/K603/39603602.PDF.

[12] *Id.*; *see also*, *e.g.*, *id.* at 5 ("Our updated definition is designed to promote competition by technological neutrality while preserving the essential consumer protections."); 12 ("Any carrier may use any technology to satisfy any obligation to provide basic service . . . .").

> Different modes of technology may accommodate variations in how basic service is provided. A definition designed to be technologically and competitively neutral, however, does not require that all modes of technology provide basic service in identical fashion. The adopted definition must be broad enough to accommodate variations in service features and billing arrangements. As technology and network architecture varies, the trade-offs of competing basic service options may also vary. At the same time, a technology-neutral definition does not mean settling for the lowest common denominator of service standards. Allowing such degradation in standards would undermine principles of universal service. Essential basic needs, particularly among the most vulnerable segments of the customer base (e.g., the elderly, those with disabilities, low-income segments, etc.) must continue to be met consistent with [California's] universal service policies.[13]

We understand that the telecommunications market has changed since 2012, which is why we are now considering updates to California's Carrier of Last Resort Rules[14]—a process in which AT&T has been a willing participant.[15] The CPUC and the parties continue to shape those new rules, but neither the existing rules nor any new rules would prohibit any ILEC from retiring copper in favor of new technologies.

Our policy preference for modernized networks cannot, however, override our obligation to protect California's most vulnerable citizens, many of whom still rely on the functionality that AT&T's wireline network provides. California supports responsible

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[13] *Id.* at 13.

[14] *Order Instituting Rulemaking Proceeding to Consider Changes to the Commission's Carrier of Last Resort Rules*, R.24-06-012 (Cal. P.U.C. June 28, 2024), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M534/K685/534685783.PDF.

[15] *See* Pac. Bell. Tel. Co. Reply Comments, App'x A, Joint Proposal of AT&T California and Cal Advocates for Fiber Deployment Commitment for COLR Relief and Basic Service Discontinuance, R.24-06-012 (filed Feb. 13, 2026), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M599/K152/599152770.PDF.

technology transitions, including moving from copper networks to more advanced network technologies. That's why California's universal service obligations are technology-neutral.[16] But although AT&T asserts that every customer affected by its proposed discontinuances will have access to replacement services, it does not adequately demonstrate that to be true—and, indeed, AT&T is currently seeking to invalidate state regulations that ensure the continuity of service.[17] As the Commission correctly noted in its *Network Modernization Order*, the "[p]remature retirement of copper infrastructure without verified, fully operational replacement systems creates unacceptable risks to public safety and emergency communications continuity."[18] It is critical to ensure that those "fully operational replacement systems" are available to every customer who will be affected by AT&T's proposed discontinuances.

At bottom, the issue is straightforward:

> No carrier shall discontinue, reduce, or impair service to a community, or part of a community, unless and until there shall first have been obtained from the Commission a certificate that neither the present nor future public convenience and necessity will be adversely affected thereby.[19]

As demonstrated below, AT&T's applications do not meet that standard.

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[16] *See generally Decision Adopting Basic Telephone Service Revisions*, D.12-12-038.

[17] *See AT&T Preemption Petition*; *Pac. Bell Tel. Co. v. Reynolds*, No. 3:26-cv-03148 (S.D. Cal. May 20, 2026).

[18] *Network Modernization Order*, FCC 26-19, at para. 14 n.41 (quoting Communications Workers of America *Ex Parte* Comments, WC Docket Nos. 25-209, 25-208, at 2 (filed Mar. 18, 2026).

[19] 47 U.S.C. § 214(a).

At a minimum, we request that these applications be removed from streamlined processing. Under the *2016 Technology Transitions Order*,[20] to qualify for streamlined treatment, a discontinuance application must show that "a replacement service [is] available to *all* affected customers covering the entire geographic scope of the service area subject to the application *and actually function as intended* for affected customers . . . ."[21] Applicants must thus "provide objective evidence showing a replacement service will provide quality service and access to needed applications and functionalities" to all affected customers.[22] This is particularly crucial where, as here, the affected areas span vast areas of the State, with vastly different topography and vastly different concerns than the areas for which the Commission has previously found AT&T's Advanced Phone service to be an adequate substitute for POTS.[23] In considering these applications, therefore, we urge the Commission to direct that AT&T to provide the answers to the following questions. Further, the Commission "may attach to the issuance of the certificate such terms and conditions as in its judgment the public convenience and necessity may require."[24] Accordingly, if the Commission moves forward with these applications, it should require terms that address the problems we identify below.

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[20] *Technology Transitions et al.,* WC Dkt. 13-5 et al., Declaratory Ruling, Second Report & Order, and Order on Reconsideration, 31 FCC Rcd. 8283 (2016) ("*2016 Technology Transitions Order*").

[21] *2016 Technology Transitions Order*, 31 FCC Rcd. at 8328, para. 123 (emphasis added).

[22] *Id.* at 8309-09, para. 75.

[23] *See AT&T Residential POTS Discontinuance Application* at 3 n.8 (citing discontinuance applications for POTS service in nine wire centers in Oklahoma, affecting a total of 52 customers; for POTS service in wire centers in seventeen states in the South and Midwest; and for a call-forwarding service in nineteen states, again in the South and Midwest).

[24] 47 U.S.C. § 214(c).

1. **Adequacy of Wireless Service as a Replacement: The Commission should require that AT&T provide complete information on how many customers will have access to: (1) multiple facilities-based providers, (2) a single facilities-based provider, or (3) non-facilities-based providers, and should require AT&T to confirm with a high level of certainty that mobile coverage will be available to affected customer indoors, not simply outdoors.**

AT&T's discontinuance applications rely principally on the availability of AT&T's LTE-based Advanced Phone service, and claim that affected customers are served by one or more "facilities-based mobile wireless" provider as well. AT&T has not shown, however, that the indoor mobile voice coverage in the affected areas—as opposed to the outdoor coverage—is sufficient to render wireless service an adequate substitute for AT&T's wireline residential and business services.

AT&T relies on the Commission's National Broadband Map as the basis for determining mobile voice coverage.[25] As the name suggests, however, the National Broadband Map displays broadband, not voice, coverage. The Mobile LTE Coverage Map *does* display voice coverage—but explicitly states: "The map depicts the coverage a customer can expect to receive when outdoors and stationary. It is not meant to reflect where service is available when a user is indoors."[26]

Nor can provider-reported coverage data prove indoor coverage. On an industry-wide basis, this data has a critical flaw, as a 2025 Government Accountability Office report notes: "providers have an incentive to overstate the service they offer to prevent

[25] *AT&T Residential POTS Discontinuance Application* at 3.

[26] *See* FCC Mobile LTE Coverage Map, *available at* https://www.fcc.gov/BroadbandData/MobileMaps/mobile-map.

competitors from having an opportunity to provide service in the same location."[27] And the wireless service providers themselves concede that their claimed coverage map area cannot guarantee service to a specific location or at an address level: AT&T has states that its mobile network is designed primarily for outdoor service, stating that its wireless services "are mobile, so a customer can make and receive calls outside the home."[28] And it explains that its mobile coverage map "displays approximate outdoor coverage. Actual coverage may vary. Coverage isn't guaranteed and is subject to change without notice."[29] And Verizon, as another example, writes: "Verizon's voice coverage maps that are filed with the FCC do not guarantee service at all times and are only reflective of approximate coverage."[30] Moreover, it is widely known that obstructions such as

[27] U.S. Gov't Accountability Office, Broadband Programs, *Agencies Need to Further Improve Their Data Quality and Coordination Efforts*, GAO-25-107207, at 13 (Apr. 17, 2025), *available at* https://www.gao.gov/products/gao-25-107207.

[28] Pac. Bell. Tel. Co. D/B/A AT&T California's (U 1001 C) Opening Comments on Administrative Law Judge's Ruling Regarding Comments on Topics Discussed at August Workshop, R.24-06-012, at 24 (Nov. 21, 2025), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M588/K334/588334709.PDF

[29] https://www.att.com/maps/wireless-coverage.html.

[30] Opening Comments of Cellco Partnership D/B/A/ Verizon Wireless (U 3001 C) On Administrative Law Judge's Ruling Issuing Staff Proposal, R.22-03-016, at 46, (filed Sept. 3, 2024), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M539/K204/539204635.PDF. Additionally, as of November 14, 2025, the websites of each of the three large national mobile carriers indicated the same. AT&T Mobility's coverage map, *available at* https://www.att.com/maps/wireless coverage.html, includes the following clarification: "This map displays approximate outdoor coverage. Actual coverage may vary. Coverage isn't guaranteed and is subject to change without notice." Verizon's coverage map, *available at* https://thingspace.verizon.com/documentation/get-started/global-coverage-map.html, includes the following language: "These Coverage maps depict predicted and approximate wireless coverage. The coverage areas shown do not guarantee service availability and may include locations with limited or no coverage. Even within a coverage area, there are many factors, including customer's equipment, terrain, proximity to buildings, foliage, and weather that may impact service." T-Mobile's coverage map, *available a*t https://www.t-mobile.com/coverage/coverage-map, "approximates anticipated coverage outdoors (including 600Mhz 4G LTE) based on a variety of factors, which may include limited or no coverage areas, and does not guarantee service availability; some data intensive uses may have decreased functionality in low-bandwidth areas, especially indoors or on the exterior edges of the approximated coverage area. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, your equipment, obstructions, weather and other conditions may interfere with service quality and availability."

buildings and walls may affect the quality of wireless communications.[31] Thus, mobile service provider maps cannot reliably determine that a wireless service is an adequate replacement for a wireline service without further proof of indoor coverage.

This lack of a service-quality guarantee for every affected customer conflicts with the requirements of the Adequate Replacement Test.

2. **Availability and Comparability of Service: The Commission should require AT&T to provide additional support, at an address level, for each impacted location within the affected wire centers, that AT&T Phone - Advanced (AP-A) is in fact available to each affected customer or potential customer. The additional information should include:**
    a. *Whether each location has sufficient mobile coverage to enable access to AP-A;*
    b. *Whether the customer will need to obtain and pay for additional connectivity service outside AT&T;*
    c. *Whether the customer will have to pay for additional equipment including battery backup; and*
    d. *The actual out-of-pocket costs the customer will pay for substitute service.*

AT&T's applications rely on the availability of AP-A as an adequate replacement service to all affected customers and claim that, because the Commission has "previously found AP-A to be an adequate replacement for the Affected Service," it is an adequate replacement for its existing wireline service.[32] As noted above, however, the applications for which the Commission has previously allowed reliance on AP-A differ greatly from the areas at issue here.[33]

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[31] Georgia Tech Computing & Society Lab, *What does it take to prove that you don't have good cell service?*, *available at* https://cands.cc.gatech.edu/blog/what-does-it-take-fcc-challenge/.

[32] *AT&T Residential POTS Discontinuance Application* at 6; *AT&T Business POTS Discontinuance Application* at 6.

[33] *See supra* at 5 n.19.

The CPUC has prepared a table comparing AT&T's existing basic service offerings with, as best as we can tell, the requirements of AP-A:

Comparison of AT&T Basic Service with AT&T Phone-Advanced (AP-A)

	Basic Service Line	AT&T Phone-Advanced (AP-A)
Connectivity	Telephone line	Internet or cellular network connection required
Internet or cellular connection monthly charge	Not applicable	$30/month for Internet 300 where fiber is available[34]
Installation charge	One-time: $49.00	For AP-A, $0 promotional offer; $10 installation fee for Fiber 100
Monthly charge	Flat rate service: $50.00/month	$45.00/month $50.00/month with international calling
Backup battery	Only needed for cordless phones	Required for both AP-A unit and modem or optical network unit.
Equipment		$188 for AP-A (promotional offer $1)
Services offered	Nine (9) basic service elements: voice grade connection, access to 9-1-1, directory services, California LifeLine, free 800 and 8YY calling, California relay, customer service information, call blocking, and operator services.	• Local and long-distance voice calling • Voicemail • Online management of features • Call Forwarding, Caller ID, and Call Waiting • Digital Phone Call Protect • E911 location detection with 24-hour automatic battery backup[35] • 3-way calling and anonymous call blocking
Total Monthly Cost	$50.00	$45.00-65.00 or more, depending on presence of a reliable cellular connection.

[34] "If the AT&T cellular network connection is unavailable, you'll stay connected via broadband service if you have one." https://www.att.com/home-phone/phone-advanced/?msockid=0d52284046f9640f249e3f34476f659e. *See* Internet 300 pricing details at https://www.att.com/internet/fiber/.

[35] "If you're using a cordless phone with your AT&T Phone – Advanced service, a separate battery backup or other power source may be required to place calls, including 911, if there is a power outage." https://www.att.com/home-phone/phone-advanced/?msockid=32c58336ac9667a9250c9440ad5a6694.

AP-A could, therefore, be considerably more costly than California's Basic Service: AP-A relies on a cellular signal[36] or a separate internet connection and internet service plan.[37] For areas of the state with a poor cellular signal—typically, rural and low-income areas—consumers would need to order and pay for a separate internet service, assuming one is available, which would make AP-A more expensive than Basic Service. It is, moreover, unclear from AT&T's applications whether AP-A supports either California LifeLine service or California Relay service, both of which are critical to ensuring continuity of service to vulnerable populations.

3. **Geographic Scope: The Commission should require AT&T to clearly identify, for each affected location, the alternative service offered to the affected customers.**

As the Commission recently explained, to show that a service can replace a discontinued service, applicants must "provide a greater level of detail than simply providing a high-level aggregate list of which replacement services it relief on for any given large geographic area covered by the application . . ." and must "identify the available replacement services using the smallest practicable geographic unit depending on the geographic areas impacted by the specific application at issue . . . ."[38]

AT&T's applications claim that cable, fiber, and fixed wireless broadband (not voice) services are offered by other providers in AT&T's California service territory, but

[36] "CELLULAR: Select the location for your AP-A device on the first or second floor near a window or outside wall (to ensure the best cellular connection)." https://www.att.com/scmsassets/support/other/It%20.pdf.

[37] "With this setup option, as long as your AP-A device receives an AT&T cellular signal, the AP-A device will use the cellular connection most of the time, and will automatically switch to broadband internet if your cellular connection goes down." https://www.att.com/scmsassets/support/other/It%20.pdf.

[38] *Network Modernization Order*, FCC 26-19, para. 25.

falls short of clearly identifying the companies that offer voice service to the wire centers and customers affected by its proposed discontinuance. Instead, AT&T simply cites the National Broadband Map without identifying the overlay of the impacted wire centers in its applications with the level or type of service available in the impacted area.[39] There are an estimated five million serviceable locations within AT&T's affected wire centers.[40] AT&T has thus failed to identify the services available to each affected location at the "smallest practicable geographic unit."[41] Failure to do may result in overstating availability of service for existing and potential customers, which in turn creates false expectations for what is actually available. Customers are then left with the burden to determine how to obtain alternative services. The Commission should ensure an orderly transition by requiring AT&T to clearly identify which alternatives are available where.

4. Hardships to Vulnerable Customers:

a. *The Commission should require AT&T to clearly identify the number of low-income customers in the affected wire centers that currently subscribe to California LifeLine through AT&T; and*
b. *The Commission should require AT&T to clearly identify the number of disabled customers in the affected wire centers that rely on California Connect products and services through AT&T.*

As Commissioner Gomez correctly wrote: "The transition from legacy copper to IP-based services is not a uniform experience. Those who are most affected are often in

[39] *AT&T Residential POTS Discontinuance Application* at 3.

[40] *AT&T Preemption Petition* at 10.

[41] *Network Modernization Order*, FCC 26-19, para. 25.

rural, remote, tribal, and low-income communities, where alternatives are least mature and the consequences of a gap in service are most severe."[42] To this list we would add as well seniors, persons with disabilities, and those with limited digital literacy. The burden of AT&T's proposed discontinuances will not be borne evenly by all of the affected customers and across all of the affected locations. California strongly urges the Commission to take our most vulnerable residents into account.

For many vulnerable consumers, traditional voice service functions as a necessity rather than a discretionary service. These customers rely on access to essential communications services for emergency communications and 911 access; medical monitoring and health-related devices; accessibility services, including relay services and captioned communications; contact with caregivers, family members, and social-service providers; and continuity of service during power outages and natural disasters. Where alternatives require broadband subscriptions, smartphones, new equipment purchases, battery backup systems, or greater technical sophistication, the practical result may be exclusion rather than substitution. Thus, the Commission should evaluate the proposed discontinuances not solely on whether a theoretical alternative service exists, but also on whether consumers will retain reasonably comparable access to affordable, reliable, and accessible communications services.

Availability alone does not establish equivalency. A service should not be considered an adequate replacement for the wireline services AT&T now seeks to retire if

[42] Statement of Comm'r Anna M. Gomez, *Network Modernization Order*, FCC 26-19.

it costs substantially more than the existing service; requires additional equipment purchases; depends on additional, customer-supplied broadband; fails during commercial power outages without customer-provided backup power; is incompatible with assistive technologies; provides inferior indoor coverage; or results in diminished 911 functionality or reliability. The existence of such barriers indicates that the proposed discontinuance may reduce consumer welfare and undermine the longstanding federal goal of universal service.[43]

Low-income households face a direct affordability and continuity risk. California LifeLine is expressly designed to provide discounted home phone and cell phone service to qualified households. The CPUC recently launched a Broadband LifeLine Pilot, which provides up to $20 per month for standalone broadband and up to $30 per month for bundled broadband and voice to better address the modern communications needs of low-income households in California.[44] Despite the steps California has taken to modernize the state LifeLine program, AT&T does not participate in the wireless, VoIP or broadband pilot segments of the program. Instead, AT&T's filing offers a substitute service that requires impacted customers to transfer to a different provider, acquire new equipment, have an alternative home broadband connection, and forgo the LifeLine subsidy. The alternative offer in AT&T's filing is not functionally equivalent for a low-

[43] *See*, *e.g.*, *2016 Technology Transitions Order*, 31 FCC Rcd at 8328, para. 123 (recognizing universal service as "the core value established by the Act").

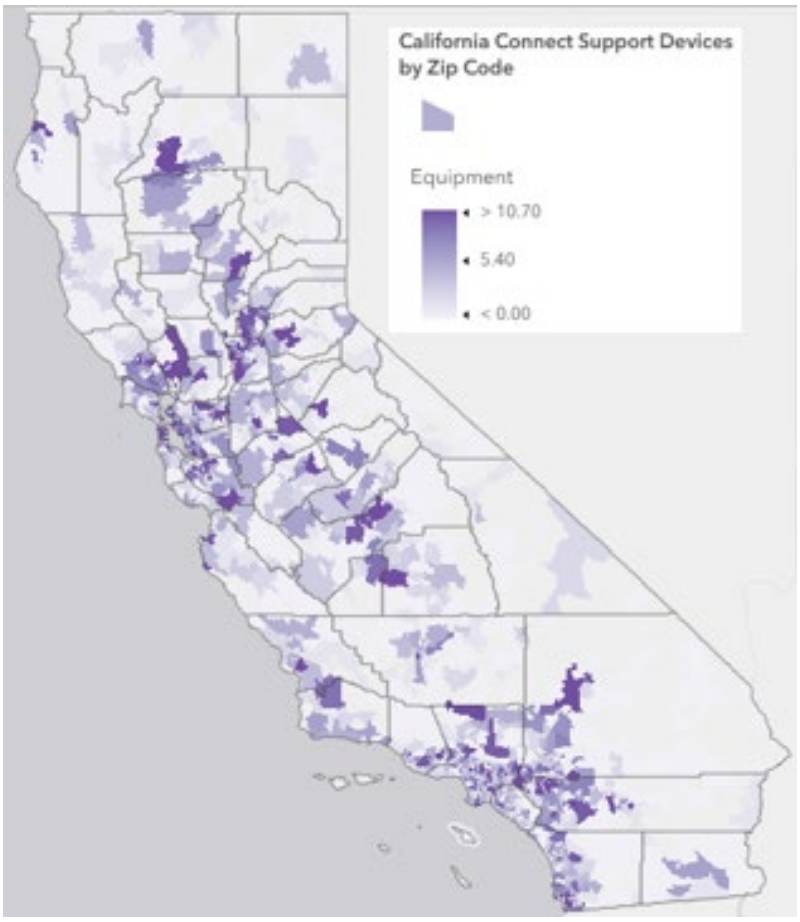
[44] *Decision Authorizing Home Broadband Pilot*, D.25-08-050 (Cal. P.U.C. Sept. 4, 2025), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M578/K668/578668809.PDF.

income customer, nor is the mere availability of a commercial alternative within a census block sufficient.

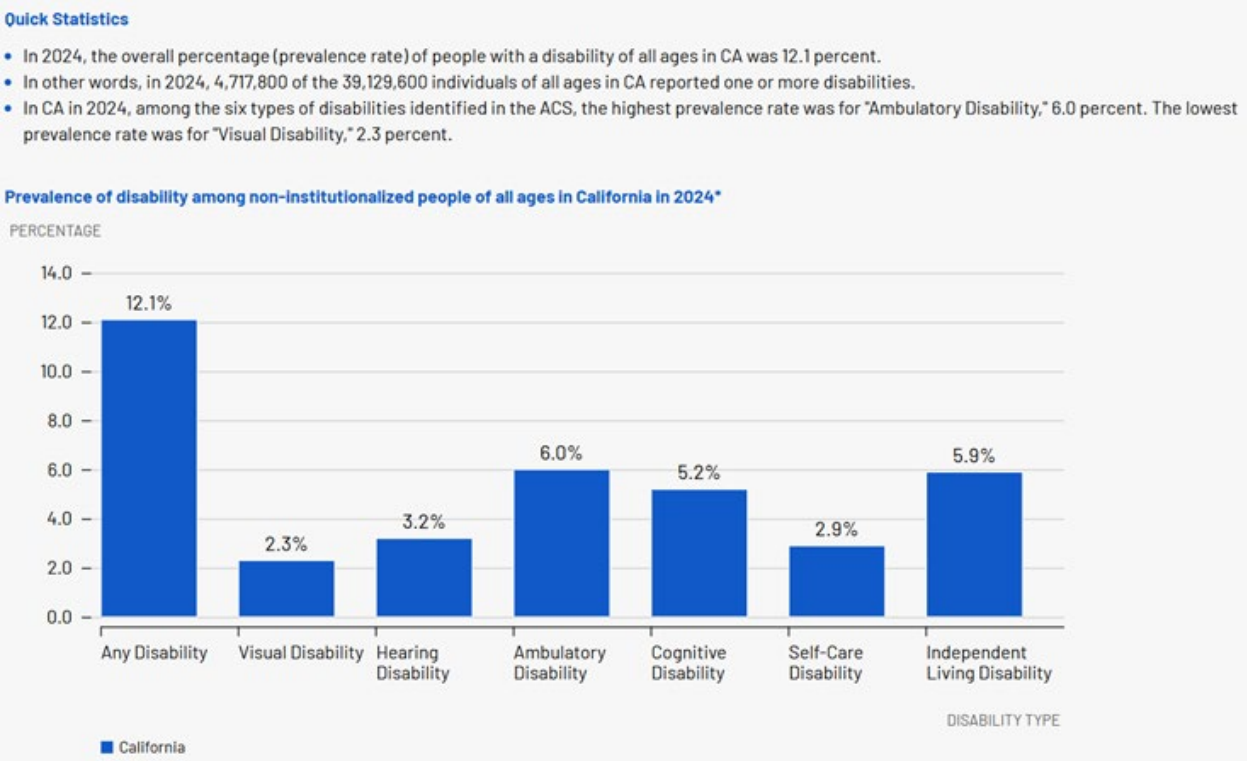
As it relates to people with disabilities, these consumers face a compounded accessibility and affordability risk. California Connect (formerly the Deaf and Disabled Telecommunications Program) exists to provide specialized telecommunications equipment, California Relay Service, and speech-generating device support to people with hearing, vision, mobility, speech, cognitive, or memory disabilities. California Connect's 2024-25 annual report states that the program serves over 650,000 participating equipment-distribution consumers, supported 323,908 relay calls in that fiscal year, and operates in a state with roughly 4.7 million residents with disabilities; the same report notes that over 20% of working-age disabled Californians live below the poverty line, and that no-cost equipment and services help bridge that affordability gap.[45]

The images on the following pages show the distribution of California Connect devices by zip code that rely on having a telephone line with access to California Relay, as well as the percentage breakdown of Californians with a disability.

[45] Cal. Pub. Utils. Comm'n, California Connect Annual Report, at 1 (Mar. 1, 2026), *available at* https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/ddtp/ddtp-annual-reports/california-connect-annual-report-2024-2025-v22.pdf.



Source: California Connect Program and Communications Division Environmental and Social Justice Working Group map.



Source: U.S. Census Bureau, American Community Survey (ACS) 2024; Disability Statistics Compendium, https://www.disabilitystatistics.org.

Finally, the concentration of low-income, Tribal, and disadvantaged communities within the discontinuance footprint raises significant concerns regarding equity, accessibility, affordability, and public safety. The CPUC's analysis, relying on CalEnviroScreen,[46] a mapping tool that measures physical, socioeconomic, and environmental health in California's communities, as well the CPUC's own Affordability Ratio Calculator,[47] shows that AT&T's proposed discontinuance footprint includes 345 (out of 360) wire centers serving low-income communities (95.8% of all affected wire centers), 25 wire centers overlapping Tribal lands (6.9%), at least 216 (60%) in

[46] *Available at* https://oehha.ca.gov/calenviroscreen.

[47] *Available at* https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/affordability.

disadvantaged-community areas, and 251 (69.7%) that contain areas of affordability concern. These analyses indicate that the proposed discontinuance disproportionately affects populations that universal service policies were specifically designed to protect. In other words, the proposed discontinuance is not isolated to a few vulnerable communities: it affects areas where low-income populations are present throughout nearly the entire footprint.

Communications services provide critical economic and social benefits through access to employment, education, healthcare, emergency services, government programs, and social support networks. And economic efficiency is not achieved when cost savings to the provider are offset by larger costs imposed on consumers, particularly those least able to bear them. If AT&T realizes operational savings while low-income households, seniors, and persons with disabilities incur higher service costs, reduced reliability, or loss of connectivity, the net effect may be a transfer of costs from the provider to vulnerable consumers rather than a genuine efficiency gain. Such outcomes raise both equity and public-interest concerns, and they are inconsistent with the principles animating our nation's universal service goals, which seek to ensure that all Americans have access to affordable and reliable communications services regardless of income, geography, age, or disability status.

The CPUC recently held public participation hearings that underscore the importance of ensuring that vulnerable consumers are not left behind when examining technology transitions:

- "Today the San Francisco Fire Department advises people to use landline phones to call 911 as the AT&T cell system is not working. Failing a landline phone, find a friend or relative with a functioning cell phone. Senior citizens are advised to maintain their landlines in the event of a Public Service Power Shutoff to access emergency services. My landline has been the source for advisory and mandatory fire evacuations issued by the [Lake] County Office of Emergency Services for the River Fire, 2018. In Lake County, the cellular infrastructure is limited due to geography and tower locations. If I want to make calls, I have to go outside of my house day or night, no matter what the weather, because I only have one bar of service and I have a metal roof. That's what my cell phone provider told me."[48]

- "Up in Humboldt County, as my colleague Supervisor Bushnell said, we are rural. We're, you know, 2.7 million acres with 130,000 people, and everybody just depends on their landlines in the far reaching areas because the cellular service is just not reliable now."[49]

- "She [the speaker's aunt] can't get cell service out where she's at because of the -- because of the trees. So, there is no help for her. She's tried T-Mobile, AT&T, Verizon, US Cellular, none of them work. The landline is only thing she has."[50]

Nor are these concerns limited to individual speakers. Local governments,[51] representatives for California's agricultural producers,[52] and representatives for the disabled community[53] all spoke to the difficulty in obtaining a true substitute for AT&T's wireline service. For example:

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[48] Testimony of Gwyneth Jones, Public Participation Hearing, A.23-03-002 and A.23-03-003 (Feb. 22, 2024).

[49] Testimony of Rex Bohn, Public Participation Hearing, A.23-03-002 and A.23-03-003 (Feb. 22, 2024). Mr. Bohn is the Humboldt County First District Supervisor.

[50] Testimony of Victor Aparicio, Public Participation Hearing, A.23-03-002 and A.23-03-003 (Feb. 22, 2024). Mr. Aparicio is a member of the Manchester Point Arena Band of Pomo Indians.

[51] *See*, *e.g.*, Opening Comments of the Rural County Representatives of California on the Proposed Decision, A.23-03-003 (May 30, 2024), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M532/K702/532702640.PDF.

[52] *See*, *e.g.*, Motion for Party Status of the California Farm Bureau Federation, A.23-03-003 (May 6, 2024), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M530/K903/530903702.PDF.

[53] *See*, *e.g.*, Opening Comments of the Center for Accessible Technology on the Proposed Decision, A.23-03-003 (May 30, 2024), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M532/K621/532621187.PDF.

- "Some areas in rural and semi-rural San Mateo County do not have any broadband internet or cellular service, and they may never be able to fully access wireless services. Even for areas that might have alternative technologies available, those alternatives are not sufficiently reliable due to a variety of factors, including power outages during natural hazard events. The power grid in rural and semirural San Mateo County is unreliable during such events, with outages sometimes lasting for several days at times. During these events, many San Mateo County residents rely exclusively on AT&T's POTS to communicate with emergency service providers and loved ones."[54]

- "Many of our rural customers have few market options when choosing quality, affordable telecommunications services to suit their unique needs. During an emergency, such as a natural disaster or electrical power outage, customers and first responders need reliable access to 9-1-1 and 2-1-1 service, including the ability to receive alerts and notifications. Landlines are the most reliable communications tool in the safety net arsenal."[55]

- "Many Santa Clara County residents live in areas where mobile phone and internet service is non-existent or spotty and they rely on landline telephone services, especially in an emergency. This is particularly true in Tier 2 and Tier 3 High Fire Threat Districts where residents have experienced repeated problems with loss of cell service during emergencies and power outages. But it also applies in urban areas with vulnerable and underserved populations."[56]

And so on. AT&T has not quantified the actual number of affected California LifeLine subscribers, California Connect participants, persons with disabilities, elderly consumers, and rural or Tribal households. Without such information, the Commission cannot reasonably determine that the proposed discontinuance is consistent with the public convenience and necessity. Once again, we ask the Commission to keep the most vulnerable in mind when considering these applications.

[54] Opening Comments of County of San Mateo on the Proposed Decision, A.23-03-003, at 2 (May 30, 2024), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M532/K694/532694071.PDF.

[55] Comment of Thomas Brown on behalf of the Kern County Board of Supervisors, A.23-03-003 (Mar. 19, 2024).

[56] Comment of Dana Reed, Director of Emergency Management for Santa Clara County, A.23-03-003 (Apr. 9, 2024).

5. **Effect on Carrier Customers: The Commission should require AT&T to identify every carrier customer located in the affected wire centers and to identify whether the carrier customer relies on any affected network elements to serve customers and should ask each affected carrier customer whether the company has access to alternative network elements to support access to existing and potential customers.**

AT&T's discontinuance applications also affect "the wholesale version of the Affected Service, which is sold to carrier customers," and facilities including "the serving central office line equipment and all outside plant facilities needed to connect that office with the network interface at the demarcation point of the customer premises."[57] To the extent other communications service providers are customers of AT&T that rely on these network elements to serve the company's own customers, customers of the carrier customer will be adversely impacted. This includes, potentially, 911 service as well as California LifeLine and California Connect services, as described above. AT&T, however, fails to identify the affected carrier customers. The Commission should require AT&T to identify any affected carrier customers so that California can plan for an orderly transition in these carriers as well.

6. **The Commission should not rely on not-yet-deployed technologies, including projects supported by BEAD, in determining whether adequate substitutes exist.**

The federal government has not yet recognized Low Earth Orbit satellite broadband as an adequate replacement service for voice service[58]—as AT&T itself

[57] *AT&T Residential POTS Discontinuance Application* at 2 n.3.

[58] *See* Congressional Research Serv., Low Earth Orbit Satellites: Potential to Address the Broadband Digital Divide, at 20 (Nov. 14, 2025) ("For example, short message service (SMS) messages are typically the only supported feature (i.e., no voice, data, or multimedia features).") *available at* https://www.congress.gov/crs_external_products/R/PDF/R46896/R46896.3.pdf.

acknowledges.[59] Despite this, AT&T relies on not-yet-deployed projects to bolster its applications, writing that "BEAD eligibility and funding for LEO mean that satellite VoIP's presence across the Affected Service Area will increase and that more locations will have access to satellite VoIP."[60] The only functioning low-earth orbit satellite internet service provider operating today is Starlink, which does not offer standalone voice service.[61] Nor are BEAD awardees required to offer voice service.[62] To the extent that LEO broadband connectivity may permit customers to use over-the-top VoIP services, there is a critical difference between those services and traditional wireline service. The former relies on peer-to-peer apps[63] and provides only "best-effort" call quality, whereas the latter provides much higher service quality and reliability, which uses dedicated circuit-switched channels for voice calls.

Moreover, BEAD projects have up to four years to deploy service,[64] and California's BEAD Final Proposal has not yet been approved by the NTIA.[65] The

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[59] *AT&T Residential POTS Discontinuance Application* at 10.

[60] *Id.* at 11.

[61] Starlink supports common VoIP apps like Skype and Microsoft Teams but does not offer standalone voice service. *See* https://blinqblinq.com/does-voip-work-with-starlink/.

[62] *See* Notice of Funding Opportunity and Public Law 117–58 (Nov. 15, 2021), *available at* https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf.

[63] T-Satellite relies on Starlink for IP data connectivity and allows voice calling over a data connection using apps like WhatsApp, which use VoIP. Call quality depends on the stability of the satellite connection without the dedicated bandwidth guarantee of a session initiation protocol (SIP) trunk.

[64] *See* 47 U.S.C. §1702(h)(4)(C); Nat'l Telecomms. & Information Admin., Broadband Equity, Access, and Deployment (BEAD) Program: BEAD Restructuring Policy, *available at* https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf.

[65] *See* Nat'l Telecomms. & Information Admin, BEAD Progress Dashboard (last accessed June 12, 2026), *available at* https://www.ntia.gov/funding-programs/internet-all/broadband-equity-access-and-deployment-bead-program/progress-dashboard.

Commission cannot find, on the record here, that LEO satellite broadband or projects subsidized through the BEAD program are adequate substitutes for the wireline services that AT&T seeks to discontinue.

California is committed to network modernization and encourages California's carriers to build a network that is fit for the most advanced state in the nation. That cannot, however, come at the expense of the people of California. California opposes the applications as presented and respectfully asks the Commission to reject these applications. In the alternative, we ask the Wireline Competition Bureau to remove these applications from the streamlined process and ask the Commission to direct AT&T to address the concerns we have raised here.

Respectfully submitted,

CHRISTINE J. HAMMOND
JONATHAN C. KOLTZ

By: /s/ JONATHAN C. KOLTZ
Jonathan C. Koltz
Assistant General Counsel

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: 415-703-2760
Email: jonathan.koltz@cpuc.ca.gov

June 15, 2026

Attorneys for the People of the State of California and the California Public Utilities Commission