Date of Hearing: April 30, 2025

ASSEMBLY COMMITTEE ON COMMUNICATIONS AND CONVEYANCE
Tasha Boerner, Chair
AB 470 (McKinnor) – As Amended March 17, 2025

**SUBJECT**: Telephone corporations: carriers of last resort

**SUMMARY**: This bill would provide procedures for telephone corporations to terminate their carrier of last resort obligations only in specified areas that are well-served, as defined, and also in areas where the United States Census Bureau reports no population or in areas where telephone corporations provide no basic exchange service to any customer. This bill would require telephone corporations to fulfill specified conditions and meet certain notice requirements to be relieved of the carrier of last resort obligations.

Specifically, **this bill**:

1) Establishes findings and declarations of the Legislature.

2) Establishes that a telephone corporation shall no longer be a carrier of last resort in areas with no population or where the telephone corporation providers no basic exchange service to any customer, when it fulfills specified obligations as specified.

3) Establishes that a telephone corporation shall no longer be a carrier of last resort in well-served areas, when it fulfills specified obligations as specified.

4) Defines "well-served" to mean at least three different facilities-based service providers, providers offer alternative voice service in the relevant area, and at least one of the service providers is a wireline provider and at least one of the service providers offers a comparatively priced alternative voice service. The alternative voice service shall be available to at least 99.9% of the broadband-serviceable locations in the area, as such broadband-serviceable locations are set forth in the most recent publicly available Federal Communications Commission National Broadband Map showing fixed and wireless broadband coverage.

5) Defines "alternative voice service" to mean a retail service made available through a technology or service arrangement by a provider that provides, as a stand-alone service or as part of a bundled service, all of the following

   a. Voice access interconnected with the public switched telephone network.
   b. Access to emergency 9-1-1 service and E-9-1-1 service in compliance with current state and federal laws and regulations.
   c. Compatibility with a backup power source.
   d. A billing option with monthly rates and without contract or early termination penalties.
   e. Access to the California Relay Service pursuant to Section 2881 for deaf or hearing-impaired persons or individuals with speech disabilities.

f. Access to customer service for information about service termination, repair, and billing inquiries.

g. Free access to 800 and 8YY toll-free services with no additional usage charges for such calls.

6) Requires a telephone corporation that seeks to amend its status as a carrier of last resort to first publish its notice of intention one time in the nonlegal section of a newspaper of general circulation throughout the relevant areas and on any social media channels the company utilizes for marketing in those areas, as specified.

7) Establishes a process for a residential consumer that may oppose an assertion by a telephone corporation that there is no population or no customer in area, or that an area is well-served, as specified. The process includes independent third-party review of the claim by a third-party selected by the CPUC and paid for by the telephone corporation.

8) Establishes specific requirements for a telephone corporation that seeks to amend its status as a carrier of last resort in an area with no population or where the corporation provides no basic exchange service to any customer. The requirements include a notice to specified entities.

9) Establishes that amended status as a carrier of last resort in an area with no population or where the corporation provides no basic exchange service to any customer shall be effective 30 days from the date of the notice.

10) Requires a telephone corporation that seeks to amend its status as a carrier of last resort in well-served areas shall commit to certain obligations, as specified, and provide notice to customers in that area, as specified.

11) Establishes that a telephone corporation's amended status as a carrier of last resort shall be effective 30 days from the final customer notice or 30 days from the date of the commitment letter, whichever is later.

12) Provides that a customer in a well-served area has certain rights to choose an alternative voice service provider, or remain on their basic exchange service for a period of 12 months.

13) Establishes an obligation, for a period of 10 years, for a telephone corporations that has received amended status to provide alternative voice service to any residential consumer that is unable to obtain alternative voice service for another provider, as specified.

14) Establishes that this bill does not confer regulatory authority to the commission over alternative voice services.

15) Requires the CPUC, as part of an existing proceeding, to determine a transition plan that shall be followed for areas that are not well-served or have no population or no customers.

16) Establishes the The Public Safety Agency Technology Upgrade Grant fund, subject to continuous appropriation without regard to fiscal year. Specified that the fund may accept donations from nongovernmental entities.

17) Specifies that this bill does not apply to intrastate legacy time-division multiplexing services used to directly connect land mobile radio systems used for public safety.

18) Specifies that this bill does not apply to any inhabited island that is not part of the mainland area of the state and is not accessible by bridge or road, if any part of the island is well served.

**EXISTING LAW**:

1) Establishes that telephone corporations are public utilities subject to control by the Legislature. (California Constitution Article XI § 3)

2) Authorizes the California Public Utilities Commission (CPUC) to, among other things, establish rules for all public utilities subject to its jurisdiction. (California Constitution Article XI § 6)

3) Defines "telephone corporation" to include every corporation or person owning, controlling, operating, or managing any telephone line for compensation within this state. (Public Utilities Code Section 234)

4) Defines "service area" for purposes of the operations of a telephone corporation, to mean a local access and transport area as defined and approved by the United States District Court for the District of Columbia circuit in the case of the *United States v. Western Electric Co., Inc., and American Telephone and Telegraph Co., CA 82-0192*, April 20, and July 8, 1983, and in a Memorandum and Order of August 5, 1983. (Public Utilities Code Section 230.3)

5) Requires the CPUC to ensure that public utilities furnish and maintain such adequate, efficient, just and reasonable service, instrumentalities, equipment, and facilities as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public. (Public Utilities Code § 701)

6) Requires a telephone corporation, before it exits the business of providing interexchange services to all of its customers or to an entire class of its customers, to provide those affected customers with a written notice at least 30 days prior to the proposed transfer of those customers to another telephone corporation, as specified. (Public Utilities Code § 2889.3)

7) Requires the CPUC to require telephone corporations to provide customer service to telecommunication customers that includes, but is not limited to, sufficient information upon which to make informed choices among telecommunications services and providers, ability to access a live operator by dialing “0”, reasonable statewide service quality standards, and information concerning the regulatory process. (Public Utilities Code § 2896)

8) Defines “telecommunications service” to mean voice communication provided by a telephone corporation, voice communication provided by a provider of satellite telephone service, voice communication provided by a provider of mobile telephone service, and voice communication provided by a commercially available facilities-based provider of voice communication services utilizing Voice over Inter Protocol (VoIP). (Public Utilities Code § 2892.1)

9) Establishes the California High Cost Funds (CHCF) A, CHCF B, Universal Lifeline Telephone Service Trust, the Deaf and Disabled Telecommunications Program, and the California TeleConnect Fund. (Public Utilities Code Sections 270 to 281)

10) Requires the CPUC to require every telephone corporation providing telephone service within a service area to file a schedule of rates and charges providing a class of lifeline telephone service. (Public Utilities Code Section 876)

11) Requires every telephone corporation providing service within a service area to inform all eligible subscribers of the availability of lifeline telephone service, and how they may qualify for and obtain service, and shall accept applications for lifeline telephone service according to procedures specified by the CPUC. (Public Utilities Code Section 876)

12) Authorizes the CPUC to annually determine user fees to be paid by every electrical, gas, telephone, telegraph, water, sewer system, and heat corporation and every other public utility providing service directly to customers or subscribers and subject to the jurisdiction of the commission, as specified. (Public Utilities Code Sections 431 to 435)

13) Declares that the policies for telecommunications in California are as follows:

a. To continue our universal service commitment by assuring the continued affordability and widespread availability of high-quality telecommunications services to all Californians.

b. To focus efforts on providing educational institutions, health care institutions, community-based organizations, and governmental institutions with access to advanced telecommunications services in recognition of their economic and societal impact.

c. To encourage the development and deployment of new technologies and the equitable provision of services in a way that efficiently meets consumer need and encourages the ubiquitous availability of a wide choice of state-of-the-art services.

d. To assist in bridging the "digital divide" by encouraging expanded access to state-of-the-art technologies for rural, inner-city, low-income, and disabled Californians.

e. To promote economic growth, job creation, and the substantial social benefits that will result from the rapid implementation of advanced information and communications technologies by adequate long-term investment in the necessary infrastructure.

f. To promote lower prices, broader consumer choice, and avoidance of anticompetitive conduct.

g. To remove the barriers to open and competitive markets and promote fair product and price competition in a way that encourages greater efficiency, lower prices, and more consumer choice.

h. To encourage fair treatment of consumers through provision of sufficient information for making informed choices, establishment of reasonable service quality standards, and establishment of processes for equitable resolution of billing and service problems. (Public Utilities Code Section 709)

**FISCAL EFFECT**: Unknown. This bill has been tagged fiscal by the Legislative Counsel.

**COMMENTS**:

1) *Intent of bill.* The intent of this bill is to encourage the deployment of advanced telecommunications capability, such as high-speed broadband, by establishing a process for regulatory forbearance of legal obligations on telephone corporations that are designated as a carriers of last resort. In doing so, the author intent is to promote competition in the market and encourage infrastructure investment, while balancing those benefits with ensuring continued universal access to telecommunications service. According to the author: "AB 470 will incentivize investment in more advanced and affordable communications for all Californians. Modern network services are more innovative, reliable, fast and generally meet the twenty-first-century needs of Californians. In addition to superior services and reliability, the cost of VoIP and wireless services have been steadily decreasing for the past two decades, while during the same period, copper landline services have drastically increased in cost. With affordable modern internet-based and wireless-based phone services, consumers benefit from greater affordability and additional features that will keep all Californians connected to each other and people around the world."

2) *What is a Carrier of Last Resort (COLR)*? Under state and federal laws, an entity that owns, operates, or manages a telephone line for compensation is a public utility, specifically a telephone corporation. A carrier of last resort (COLR) is a designated telephone corporation that has a legal obligation to provide access to basic telephone service to any household in its service territory who requests it. In a competitive market environment that exists across much of the state today, where consumers have multiple options to meet their voice communications needs, the COLR is literally the last-resort if no other carrier is willing or able to offer service. Across the state, every census block has a specified carrier that is designated as the COLR by the California Public Utilities Commission (CPUC), even in areas where there may be multiple providers offering telephone service. In areas where there are multiple providers in the market, it is typically only one carrier that is designated to hold the legal obligations of the COLR. The legal obligations placed on a COLR have been a tenant of universal service for decades, to ensure that everyone has guaranteed access to safe, reliable, and affordable telephone service. According to the California Public Utilities Commission (CPUC), there are 16 COLR-designated companies across California with distinct service territories. AT&T is the designated COLR in many parts of the State and is the largest COLR in California; Frontier is the second largest COLR in the State.

   For much of the 20th century a single company, the American Telephone & Telegraph (now AT&T), owned and operated essentially all of the telephone infrastructure in the country as a regulated monopoly granted by government. Along with that market power, utility regulatory bodies such as the CPUC were vested with the authority to regulate the rates of telephone service to ensure just and reasonable prices for customers, control against unreasonable profits, and enforce the obligations to serve all customers in a discriminatory manner. In that market context, it was clearly not unreasonable to require that the only telephone carrier available in the marketplace would be expected to serve all the households in its service territory, rural and urban, as a carrier of last resort. However, this scheme began to change in the 1980's with the introduction of competition into the telephone market. In 1982, the United State Department of Justice succeeded in its antitrust litigation against AT&T, resulting in a breakup of the company into smaller regional entities. The breakup of AT&T

also paved the way for further innovation of telecommunications and other competitors to enter the telephone services market. For example, mobile telephone service first began to become commercially available in the 1980s. Subsequently, Congress passed the Telecommunications Act of 1996, which further incentivized competition in telecommunications service market as a means to reduce prices, and increase quality and innovation. Despite the proliferation of competition in the telecommunications marketplace over decades, COLR requirements have remained as a means to ensure there is a guaranteed provider of basic telephone service regardless of the status of the market. The perspective of this bill is that such COLR requirements are no longer required, and may actually hinder further investment and competition in the market. Accordingly, this bill proposes a process for automatically forbearing telephone corporations of their COLR obligations in some areas that meet the criteria established by this bill.

3) *In some areas consumer preferences have shifted beyond landline voice communications.* Just as the preferred type of telecommunications technologies transitioned at the turn of the 20th century from telegraph to telephone, consumers today are once again increasingly transitioning towards more modern telecommunications services such as mobile telephone and broadband internet service when those options are available. For example, consider several data points from the Center for Disease Control (CDC) National Center of Health Statistics, which has measured the availability of telephone service in households for decades. In 1999 the CDC estimated that about 95% of California households had a household telephone, while in 2007 nationwide figures showed that only about 16% of households relied on wireless phone service only. Data from 2023 show that 76% of adults lived in households that did not have landline telephone but did have at least one wireless telephone, a stark difference since the late 90s and early 2000s. Beyond telephone service, data from the California Statewide Digital Equity Survey published in 2023 show that 91% of households also subscribe to high-speed internet access at home. In summary, most consumers today have more options for telecommunications service, from more providers utilizing different types of technologies, than ever before. The perspective of this bill is that, because of competition, the regulatory requirements for one company to hold the entire legal obligation to serve an area is no longer necessary and is a barrier to investment and competition. However, the public benefits of competition have not been realized equally across the state.

Whereas in the monopoly era, it was essentially one company that had an obligation to provide telephone service to households as the COLR and only carrier; today's market is different. There is no carrier of last resort for mobile telephone service or broadband internet access. In fact, under state or federal law broadband internet service providers are not a public utilities or common carriers at all. Even mobile telephone providers, although they are common carriers, are not subject to the same requirements as a COLR. Unlike the monopoly era, regulators are not empowered to require a mobile telephone or broadband internet provider to expand their network to unserved households or meet baseline quality of service requirements[1]. As a result, in areas where there is little market incentive for providers to enter, households remain unserved and underserved by more advanced telecommunications technologies or wireless reception can be spotty. The areas of the state which have not

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[1] In April 2025 the CPUC issued a proposed decision to implement service quality standards on wireline Voice over Internet-Protocol (VoIP) and mobile voice communications.

benefited from competition in the market generally are disproportionately rural and lower-income, and may never be served by advanced technologies regardless of COLR or without government intervention. The dichotomy, between well-served areas with robust competition for telecommunications services, and less well-served areas where the market is not meeting consumers' needs for advanced communications services like broadband internet access illustrates a bright line. This bill is drafted in a manner that attempts to respect that bright lines, by establishing a process for relinquishment only in those areas that are well-served and in areas where there is no population or no customers. Areas that do not fall into those categories would be subject to a process that would be established by the commission at a date in the future.

4) *Are COLR regulations technology-neutral?* The California Public Utilities Commission (CPUC) has asserted that its COLR rules are technology neutral, thus inferring that existing carriers of last resort may meet their COLR obligations through any technology. Taken a step further, this assertion implies that a COLR is not required to maintain a copper network, as is claimed by supporters. This is all technically an accurate statement, but in practice the answer is more complicated.

   Under CPUC regulations, a COLR is required to offer what is referred to as "basic service" to any customer that requests it. Basic service must include several elements that are determined by the commission including: the ability to place and receive voice-grade calls over all distances, free access to 911 and enhanced-911 service, access to directory services, specified billing provisions, access to 800 and 8YY toll-free services, access to telephone relay services for disabled users, access to customer service information about Lifeline, one-time bill adjustments for certain charges, and access to operator services. Many of these element are clearly necessary and basic services for consumers, while some may be more outdated or unnecessary given today's consumer preferences and practices. Importantly to an evaluation of whether current COLR rules are technology neutral, it is absolutely possible to meet those basic service requirements through other technologies like wireless or fiber, and basic service does not require a copper connection.

   However, in addition to these basic service elements, a basic service provider is also required to file and maintain tariffs, or schedules of rates, with the commission that include basic service rates, charges, terms and conditions. The tariffs are required to be filed through a Tier 2 advice letter that is subject to review and approval by CPUC staff. Herein lies the complication when evaluating whether the CPUC's COLR rules are actually technology-neutral in practice. While it is true that a carrier of last resort could meet its COLR obligation through any technology, if it were to meet those obligations through alternatives technologies beyond copper (such as broadband) it would be subjecting those otherwise non-tariffed services to CPUC tariffing requirements. In effect then, the COLR's alternative services would necessarily be regulated differently than their competitors merely because their status as a COLR. Therefore, in practice the CPUC's COLR requirements are not as neutral in practice as may have been represented.

5) *The bill does not grant blanket COLR relinquishment across the state.* Many of the organizations opposed to this bill have expressed concerns about the impact of this bill for all Californians, and especially those in rural communities or where reliable access to telephone service has not been consistently available except through the carrier of last resort. Certainly those areas are worthy of special consideration, and this bill does distinguish among various

areas of the state. In general, this bill's provisions apply to three separate buckets, or groups, of areas: well-served areas, areas with no population or where the telephone corporation has no customers on basic exchange service, and what will be referred to as "other" areas.

This bill only proposes to establish a specific process for relinquishment of COLR obligations in the first two buckets, which are those areas that are well-served or where there are no population or no customers. Well-served areas, as defined by this bill, are areas where there are at least three other alternative voice service providers, at least one of which must be a wireline provider. In well-served areas, the public benefits from various choices of providers and many have willingly chosen to subscribe to services from carriers that are not carriers of last resort. Still, it is undeniable that relinquishing the obligation of a carrier of last resort to serve all customers poses an inherent risk to the public's universal access to telephone service. Nonetheless, short of a market collapse, it is likely that residents of well-served areas will continue to have access to reliable voice communication services even despite relinquishment of COLR. This is evidenced by the fact that most consumers in well-served areas purchase services other than COLR basic service, such as broadband, VoIP, or mobile wireless telephone service. Additionally, in recent history large providers have rarely gone out of business, although there has been market consolidation. Notably, the CPUC is required to approve mergers of telecommunications providers and this bill does not change that.

Beyond well-served areas, this bill establishes procedures for amended status in no population or no customer areas. In these areas, there is obviously a smaller risk for public impact because of the nature of those areas having no population. However, to the extent that those areas may be developed in the future, there is a risk that no provider would be willing to serve new developments. Again, here the actual risk of a stranded customer is unlikely because a local government would have to approve new development and likely would know the area is not covered by COLR before doing so. Even so, for a period of 10 years, this bill would require a telephone corporation that has been granted amended status as carrier of last resort to be required to offer alternative voice service if there are truly no other providers.

For the other areas, which are necessarily not well served by alternative providers, this bill proposes that the CPUC should determine a transition plan that shall be followed before a telephone corporation may amend its status as a carrier of last resort in those areas. Lastly, this bill also exempts some specific areas and facilities from this bill, including Catalina Island.

6) *This bill imposes obligations on a telephone corporation seeking amended status.* As was established in the previous section, there is an inherent risk in this bill to the public's continued universal access to telephone service. However, that risk is not guaranteed to be realized, and this bill includes guardrails. Further, those risks ought to be considered alongside the potential public benefits that this bill may enable. For example, in order to receive an amended status as a carrier of last resort, a telephone corporation must make various commitments through a commitment letter. The commitments include demonstrating that it has made accessible its advanced fiber optics buildout to a minimum number of residential units and year-over-year increase in fiber buildout. Other commitment include offering an affordable broadband plan, benefits for small business customers, funding for public safety technology upgrades, funding for community-based digital literacy resources, and workforce development. This bill would also establish the Public Safety Agency

Technology Upgrade Grant program, to be administered by the CPUC and funded by donations. While this bill does require the commitment letter is signed by an offer of the corporation, the committee may wish to ensure that the commitments are enforceable through remedies sought by the CPUC.

7) *Changes to COLR would likely impact the availability of Lifeline telephone service.* As has been established, the concept of a COLR exists to ensure universal access to telephone service consistent with federal and state law. While the most obvious element of universal access is merely ensuring that an individual is capable of utilizing the telephone network for their communications needs, another element is ensuring affordable access. Without a guarantee of affordable access, universal access cannot be achieved because cost would otherwise be a barrier to low-income residents. Thus, in order to advance the public policy goal of universal access to telephone service, COLR regulations require a carrier of last resort to participate in the Lifeline program. The Lifeline program offers subsidies to eligible low-income households to assist with affording the cost of basic telephone service. Historically, Lifeline service had been provided through landline telephones, but as technology advanced the program has also supported access to mobile telephone. In fact, based on today's enrollment there are about 1.4 million Lifeline participants in the state, with only about 133,000 of those utilizing the benefit for wireline service.

   While the wireline population of Lifeline participants may be small, this bill would likely have a direct impact on their service. Particularly, if a carrier of resort is granted amended status as proposed by this bill, a low-income consumer may lose access to their only wireline Lifeline option. Conceivably some of these wireline participants could migrate to wireless Lifeline service, but it would be a forced transition. Further, this bill's definition of well-served does not ensure there is a wireless Lifeline option available. The committee may wish to consider amendments to ensure the public in well-served areas maintain access to Lifeline.

8) *The bill would grant automatic COLR relinquishment with little oversight.* While this bill does establish a public notification process that must be followed in order for a telephone corporation to gain relinquishment of their COLR obligations, the legal relief is otherwise automatic. For example, in areas where there is no population or a telephone corporation has no basic exchange service customers, a telephone corporation would automatically be granted relief after sending a notice to specified entities. Those entities - which include the Governor, the Legislature, local elected officials, and the commission - are not provided with any authority to question the accuracy of the notice. In effect, the public or regulators would have little or no legal basis to pause or deny relinquishment even if there are irregularities or disputes as to whether an area is eligible for amended status under this bill. The potential impact of this section poses a stark risk to the public. To minimize potential negative risks to the public, the committee may wish to amend this bill to provide a role to the CPUC in administering the approval of requests for relinquishment of COLR obligations, with sufficient guardrails to ensure timely and efficient processing of those requests.

9) *Could the CPUC designate a new COLR for areas that have been granted amended status?* Under the California Constitution and the Public Utilities Code, the CPUC has broad authority over telephone corporations and the authority to establish its own procedures to regulate those entities. Generally speaking and consistent with the law, the CPUC has near plenary power to impose certain requirements on telephone corporations, unless otherwise prohibited by law. While this bill is intended to establish a process to effectuate the

relinquishment of COLR obligations in some targeted areas, there is concern among non-COLR telephone corporations that the CPUC may still seek to reassign COLR obligations to other entities. While little legal basis has been provided to support the claim, it is not a far-fetched concern that the CPUC would utilize the full extent of its other constitutional and statutory authority to attempt to unilaterally designate a new COLR in amended status areas. Nonetheless, addressing this concern at this stage may be premature given the lack of further legal analysis. Moving forward, the author may wish to consider whether placing constraints on the CPUC's ability to take such an action ought to be limited or prohibited.

10) *Similar/related legislation.*

a. AB 2797 (McKinnor), 2024, was similar to the provisions of this bill. The bill was referred to the Senate Energy, Utilities and Communications Committee.

b. AB 2395 (Low), 2016, would have established a process for a telephone corporation to withdraw legacy public switched telephone network services and transition to Internet Protocol (IP) enabled services and networks, beginning January 1, 2020. The bill was held in Assembly Appropriations.

11) *Committee Amendments.*

Section 2878 – Definitions:

- Revise "alternative voice service" to "alternative voice *basic* service"
- Revise "amended status" to reflect that the area must be granted relief.
- Revise "amended status area" to reflect that area must be granted relief.
- Define "commitment letter" to mean an affidavit signed by an officer of the telephone corporation
- Define "public safety agency technology upgrade grant" to mean a grant for law enforcement agencies, as defined under Penal Code Section 13670(1), for new technologies or upgrades to existing copper-based systems to transition to modern communication systems.
- Define "small business security and alarm system technology migration assistance" to mean a voucher provided to eligible small business customers for costs associated with transitioning alarm system services. Vouchers shall be administered by the company and participation in the program reported annually to the commission.

Section 2878.1 – Regulatory Process and Well-Served Map

- Require a Tier 1 Advice Letter subject to approval by the CPUC for COLR relinquishment in no population and no customer areas.
- Change "or" to "and" for no-population/no-customer areas.
- Require a Tier 2 Advice Letter subject to approval by the CPUC for COLR relinquishment in well-served areas.
- Require the CPUC by December 15, 2026 to adopt a map designating well-served areas that are eligible for amended status pursuant to this bill. Specify that the maps adopted by the CPUC shall reflect data from the wireless coverage maps adopted pursuant to Rulemaking 23-02-016 or the Federal Communications Commission National Broadband Map, whichever is available for use to complete the map designating areas that are eligible for amended status by December 15, 2026.

- Specify that an area shall be eligible for amended status if it well-served or it is an area with no population and no customers.
- Require the CPUC to approve a request for amended status in accordance with this bill.
- Other minor and conforming technical changes.

Section 2878.2 – Advice Letter Process and Public Notices

- Require a Tier 1 Advice Letter to be filed with the commission to seek approval by the commission for amended status in no population and no customer area.
- Require a Tier 2 Advice Letter to be filed with the CPUC to seek approval by the commission for amended status in well-served areas.
- Require that notwithstanding any existing commission rule or decision, the commission shall approve an advice letter if the telephone corporation meets the requirements set forth this in this bill.
- Require the CPUC to require public notices, as provided in this bill, before approving an advice letter and prohibit the CPUC from imposing additional notice requirements.
- Specify that the notice may also be based on a map adopted by the Commission pursuant to Section 2871.1.
- Strike the requirement that a consumer opposition request must be in writing.
- Authorize the commission to accept opposition requests from consumers.
- Specify that the independent third-party review shall evaluate the *accuracy* of a customer's claim, not the *merits* of their claim.
- Specify that a claim is accurate if there is a preponderance of evidence that an area is not well-served, or does not have no-population/no-customers.
- Specify that a consumer shall be given the opportunity to submit evidence demonstrating that an area is not eligible for amended status.
- Other minor and conforming technical changes.

Section 2878.3 – Requirements for No Population and No Customer Areas

- "Or" to "and" for no population and no customer areas.
- Specify that the telephone corporation may use the national broadband map, or a map adopted by the Commission pursuant to Section 2871.1 for the customer notice.
- Strike the declaration that amended status shall be effective 30 days from the date of the notice, and instead require the amended status to be effective upon approval by the commission of the Tier 1 Advice Letter.
- Other minor and confirming technical changes.

Section 2878.4 – Requirement for Well-Served Areas

- Strike the declaration that amended status shall be effective in well served areas 30 days from the third notice, and instead specify that relief effective upon approval by the commission of a Tier 2 advice letter.
- Require that the telephone corporation must demonstrate deployment in unserved and underserved areas.
- Specify that the annual report submitted pursuant to this section shall be subject to Public Utilities Code 583.
- Revise the requirement to offer an affordable broadband plan, to instead require a discounted broadband plan.

- Require a commitment to engage in fair labor practices and workforce training for employees that may be impacted by carrier of last resort relief.
- Strike the requirement that a telephone corporation shall file a Tier 1 Advice letter and the letter shall be effective on the date filed that reflects the amended status area; this is a confirming change.
- Authorize the CPUC to seek a remedy, after notice and a reasonable opportunity to cure, if the telephone corporation fails to meet any obligation in the commitment letter.
- Other minor and conforming technical changes.

Section 2878.5 – Options for Existing Customers in Well-Served Areas

- Strike the reference to 90-day period before effective date of amended status.
- Strike the requirement that a request to the telephone corporation must be written.
- Authorize a customer to make a request directly to the commission.
- Require the independent third-party review to be based on a preponderance of evidence.

Section 2878.6 – Obligations after Amended Status is Granted

- Specify that the request for service can be made to the commission and does not need to be in writing.
- Require the commission to determine if voice service is available, not an independent third party reviewer.
- Require the CPUC to determine that no alternative voice basic service is available.
- Strike other references to process for the independent third party verifier.
- Strike the declaration that a telephone corporation shall be relieved of this section if an independent third party reviewer determines there is alternative voice service available.

**REGISTERED SUPPORT / OPPOSITION**:

**Support**

101 Enterprises Foundation
African American Community Services Agency
Alameda County Latina Chamber of Commerce
American Indian Chamber of Commerce of California
Anaheim Chamber of Commerce
Apapa Solano County
Asian Pacific American Advocates
Asian Pacific American Community Center
Asian Pacific American Leadership Institute
Asian Pacific Islander American Vote (APIAVOTE)
At&t
Barona Band of Mission Indians
Big Valley Band of Pomo Indians

Black Business Association
Black Chamber of Orange County
Black Education Expo
Boss - Business of Student Success
Boys & Girls Clubs of Carson
Boys & Girls Clubs of Fresno County
Boys and Girls Club of Central Orange Coast
Boys and Girls Club of Kern County
Business Council San Joaquin County
CA League of United Latin American Citizens (LULAC)
Calasian Chamber of Commerce
California African American Chamber of Commerce
California Chamber of Commerce
California Hawaii State Conference of the NAACP
California Hispanic Chamber of Commerce
California Indian Nations College
California Nations Indian Gaming Association
California Tennis Association for Underprivileged Youth
California Valley Miwok Tribe Aka Sheep Ranch Rancheria
California-hawaii State Conference of the NAACP
Carlsbad Chamber of Commerce
Carson Chamber of Commerce
Chemehuevi Indian Tribe
Coalition for Responsible Community Development
Community Tech Network
Concerned Black Men of Los Angeles
Concerned Citizens Community Involvement
Curry Senior Center
East Bay Leadership Council
El Camino Community College District
El Segundo Chamber of Commerce
Emac Construction
Empowerment (dess Perkins Foundation)
Enterprise Rancheria
Ewiiaapaayp Band of Kumeyaay Indians
Exp – the Opportunity Engine
Filipino American Chamber of Commerce of Solano County, INC.
Greater Bakersfield Chamber of Commerce
Greater Los Angeles African American Chamber of Commerce
Haven Neighborhood Services
Hopland Band of Pomo Indians
Iipay Nation of Santa Ysabel
Jamul Indian Village
Janet Goeske Foundation
Japanese American Citizens League
Kern Economic Development Foundation
Kidstream Children's Museum
LA Jolla Band of Luiseno Indians
Latino Education and Advocacy Days (LEAD)

Lime Foundation
Los Altos Chamber of Commerce
Los Angeles Mission
Maac Project
Mesa Grande Band of Mission Indians
Mission Bit
Monterey County Hospitality Association
Morongo Band of Mission Indians
Mother Lode Rehabilitation Enterprises INC. (MORE)
Newport Beach Chamber of Commerce
North Orange County Chamber of Commerce
Oceanside Chamber of Commerce
Onegeneration
Orange County Business Council
Orange County Hispanic Chamber of Commerce
Pala Band of Mission Indians
Palos Verdes Peninsula Chamber of Commerce
Pauma Band of Luiseno Indians
Pinoleville Pomo Nation
Reality Changers
Redding Rancheria
Rincon Band of Luiseno Indians
Rise San Diego
Salef
San Diego County Hispanic Chamber of Commerce
San Diego North Economic Development Council
San Diego Regional Chamber of Commerce
San Francisco Chamber of Commerce
San Gabriel Valley Conservation and Service Corps
San Gabriel Valley Economic Partnership
San Manuel Band of Mission Indians
San Pasqual Band of Mission Indians
Santa Ana Chamber of Commerce
Santa Clarita Valley Chamber of Commerce
Silicon Valley Leadership Group
Small Business Diversity Network
Soboba Band of Luiseno Indians
South Bay Association of Chambers of Commerce
Tejon Indian Tribe
The Arc of California
The Fresno Center
Torrance Area Chamber of Commerce
Tribal Alliance of Sovereign Indian Nations
Tulare Kings Hispanic Chamber of Commerce
United States Telecom Association Dba Ustelecom - the Broadband Association
United Way Bay Area
Ventura Chamber of Commerce
Vermont-slauson Economic Development Corporation
Walking Shield

**Opposition**

#oaklandundivided
AARP
Alliance for a Better Community
Arts for LA
Bridge the Digital Divide
Butte; County of
Calbroadband
California Alliance for Digital Equity
California Community Foundation
California Farm Bureau Federation
California Public Policy Group
California State Association of Counties (CSAC)
Center for Accessible Technology
Center for Leadership, Equity, and Research (CLEAR)
City of Agoura Hills
City of Hidden Hills
Communications Workers of America, District 9
Communities in Schools of Los Angeles (CISLA)
Community Coalition of the Antelope Valley
Consejo De Federaciones Mexicanas (COFEM)
County of Butte
County of Fresno
County of Humboldt
County of Inyo
County of Kern
County of Mendocino
County of Monterey
County of Napa
County of Nevada
County of Santa Clara
County of Santa Cruz
County of Siskiyou
County of Solano
County of Sonoma
County of Yolo
County of Yuba
Destination Crenshaw
Digital Equity LA
Diversity in Leadership Institute
Electronic Frontier Foundation
Everyoneon
Families in Schools
Fresno Coalition for Digital Inclusion
Gpsn
Hack the Hood
Healing and Justice Center
Innovate Public Schools

Institute for Local Self-reliance
Insure the Uninsured Project
Jawhara Mcclinton
Kapor Center
Las Virgenes-malibu Council of Governments
Latino Equality Alliance
Los Angeles Urban League
Luisa Calumpong, Broadband Manager, City of Oakland
Marin County Board of Supervisors
Media Alliance
Mono County Bos
Nextgen California
Our Voice: Communities for Quality Education
Pacoima Beautiful
Para Los Ninos
Parent Engagement Academy
Parent Institute for Quality Education
Puente Learning Center
Rural County Representatives of California (RCRC)
San Joaquin County Board of Supervisors
San Joaquin; County of
Shasta County Board of Supervisors
Southeast Community Development Corporation
The Utility Reform Network (TURN)
Town of Hillsborough
Trio Plus
Unite-la
United Parents and Schools
Urban Counties of California (UCC)
Vision Y Compromiso

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